

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION IX

75 Hawthorne Street San Francisco, CA 94105

Via Electronic Mail and U.S. Postal Service Mail

September 23, 2011

Keith Rudd
Sunkist Growers, Inc.
Director of Environmental and Technology
531 W. Poplar Avenue
Tipton, CA 93272

Re: Polychlorinated Biphenyls (PCBs) Under Toxic Substances Control Act 40 CFR 761.61(c) – Second Amendment to USEPA-Approved "Remedial Action Plan" for the Former Sunkist Citrus Processing Plant, 616 East Sunkist Boulevard, Ontario, California.

Dear Mr. Rudd:

We are responding to your consultant's (BEC's) September 12, 2011 letter (attached) regarding certain matters related to the cleanup of polychlorinated biphenyls (PCBs) at the former Sunkist Citrus Processing Plant (Sunkist). BEC's letter responds to the U.S. Environmental Protection Agency Region 9's (USEPA's) September 6, 2011 letter conditionally approving the First Amendment to the Remedial Action Plan¹ (TSCA PCB Cleanup Application or Application).

BEC's September 12, 2011 letter proposes additional site characterization and a dust in air concentration for monitoring onsite industrial workers for exposure to PCBs while PCB remedial and concrete crushing activities are ongoing at the Sunkist site. USEPA considers these proposals as modifications to the Application. Herein, USEPA is approving with conditions the proposed modifications to the Application and USEPA's May 22, 2011 letter approving the Application.

USEPA is approving BEC's September 12, 2011 proposals as modified by the conditions of approval established below. This conditional approval is the Second Amendment to the Application and USEPA's May 22, 2011 approval letter.

1. Item 5, Page 6, BEC's Letter. BEC proposes to conduct additional characterization sampling in asphalt and concrete areas around the west, south, and northeast perimeter of the facility. USEPA approves the 1,000 square feet (sq. ft.) sample spacing for sampling asphalt and / or concrete along the west, south, and northeast perimeter of the facility. However, a 10-feet sampling grid spacing will be applied to the Building 52 area and the areas adjacent to and surrounding the Southern

¹ USEPA approved with conditions the "Remedial Action Plan" (RAP) for the Former Sunkist Citrus Processing Plant in Ontario, California (Sunkist Site) dated May 22, 2011 and prepared by BEC for Sunkist Growers, Inc. The RAP serves as the polychlorinated biphenyls (PCB) risk based disposal approval application (Application) required in the Toxic Substances Control Act (TSCA) PCB regulations in 40 CFR 761.61(c). The Application is for the 11.11-acre Sunkist Site located at 616 East Sunkist Boulevard, Ontario, California.

USEPA Conditional Approval Under TSCA, 40 CFR 761.61(c) Remedial Action Plan, Second Amendment Former Citrus Processing Plant, Ontario, California

Date: September 23, 2011

California Edison transformer area. Regardless of which grid size or sample spacing is applied, areas with cracks and stains must be sampled. Any asphalt or concrete with a PCB concentration above the cleanup level must be removed and disposed offsite.

- 2. Item 7, Page 9, BEC's Letter. BEC is proposing to collect a total of 69 soil samples in the area covered by all the concrete stockpiles currently present at the site. USEPA approves this proposal provided a 20-foot x 20-foot sampling grid and random generation of sampling locations within that grid are used to determine the sampling locations for soils beneath the concrete stockpiles after the stockpiles have been removed. Please provide a figure depicting this modification to the figures that BEC submitted in its letter.
- 3. Item 2, Page 13, and Figure 6, BEC's Letter. BEC proposes additional soil sampling locations under PCB impacted concrete and such sampling is depicted in Figure 6 (Soil Sampling Under Impacted Concrete at WWTP) of BEC's letter. USEPA approves the proposed additional soil sampling locations in the WWTP area provided the following additional four samples are collected and analyzed:
 - a. One soil sample northeast and 10 feet diagonally from concrete sampling location "F."
 - b. One soil sample northwest and 10 feet diagonally from concrete sampling location "F."
 - c. One soil sample southeast and 10 feet diagonally from concrete sampling location "T."
 - d. One soil sample southwest and 10 feet diagonally from concrete sampling location "T."
- 4. Item 3, Page 14, BEC's Letter. USEPA approves site real time monitoring activities that are conducted in connection with site cleanups to ensure the public (e.g., nearby residents) is not exposed to site contaminants during site remediation. We noticed that in addition to this type of monitoring, BEC has proposed to monitor PCB containing dust in air to protect industrial workers at the Sunkist site during remediation.

BEC has proposed a 12 milligram/cubic meter (mg/m³) dust concentration in air at the breathing zone for onsite worker protection during remedial and crushing concrete activities.

USEPA's approval of site cleanup plans does not involve approval of worker protection measures that Sunkist may implement at the site during remedial activities. USEPA may make recommendations with respect to these issues and in this instance USEPA recommends that a 0.74 mg/m³ dust concentration be considered as a guideline to monitor onsite workers throughout the course of remedial and concrete crushing activities at the Sunkist site. USEPA derived this dust monitoring level by replacing the NIOSH Recommended Exposure Limit for Aroclor 1254 of 0.001 mg/m³ used in BEC's equation with the USEPA Regional Screening Level for Aroclor 1254 in air of 0.02 ug/m³ for the industrial worker.

USEPA Conditional Approval Under TSCA, 40 CFR 761.61(c) Remedial Action Plan, Second Amendment Former Citrus Processing Plant, Ontario, California Date: September 23, 2011

We look forward to being of assistance during Sunkist / BEC's implementation of the approved PCB cleanup Application as modified by the conditions of approval in USEPA's May 22, 2011 approval letter, September 6, 2011 First Amendment letter, and the conditions herein. Please call Carmen D. Santos at 415.972.3360 if you have any questions concerning this conditional approval.

Sincerely,

Jeff Scott, Director

Waste Management Division

Enclosures (1)

Cc: Charity Hernandez, City of Ontario Steve Armann, USEPA R9 Carmen Santos, USEPA R9 .



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION IX

75 Hawthorne Street San Francisco, CA 94105

Via Electronic Mail and U.S. Postal Service Mail

September 6, 2011

Keith Rudd Sunkist Growers, Inc. Director of Environmental and Technology 531 W. Poplar Avenue Tipton, CA 93272

Re: Polychlorinated Biphenyls (PCBs) Under Toxic Substances Control Act 40 CFR 761.61(c) – First Amendment to USEPA-Approved "Remedial Action Plan" for the Former Sunkist Citrus Processing Plant, 616 East Sunkist Boulevard, Ontario, California.

Dear Mr. Rudd:

This letter responds to your consultant's (BEC's) August 31 and September 2, 2011 letters regarding certain matters related to the PCB cleanup at the former Sunkist Citrus Processing Plant (Sunkist). BEC's August 31, 2011 letter responded to the U.S. Environmental Protection Agency Region 9's (USEPA's) August 19, 2011 letter conditionally approving the Remedial Action Plan¹ (TSCA PCB Cleanup Application or Application).

BEC's September 2, 2011 letter provided the sampling and analysis plan for the Waste Water Treatment Plant (WWTP) located at Sunkist and which will be demolished. Concrete and soil sampling activities associated with the WWTP were not addressed in the Application and BEC's September 2, 2011 letter is considered an amendment to the Application. Herein, USEPA is approving such Amendment Letter with conditions.

Below, we are responding to BEC's August 31, 2011 letter and approving with conditions BEC's September 2, 2011 Amendment Letter.

A. BEC's August 31, 2011 Letter Responding to USEPA's Conditions of Approval

1. Condition C.3 (Concrete stockpiles, statistical derivation of an additional number of concrete characterization samples). As indicated in our September 2, 2011 electronic mail (e-mail) message

¹ USEPA approved with conditions the "Remedial Action Plan" (RAP) for the Former Sunkist Citrus Processing Plant in Ontario, California (Sunkist Site) dated May 22, 2011 and prepared by BEC for Sunkist Growers, Inc. The RAP serves as the polychlorinated biphenyls (PCB) risk based disposal approval application (Application) required in the Toxic Substances Control Act (TSCA) PCB regulations in 40 CFR 761.61(c). The Application is for the 11.11-acre Sunkist Site located at 616 East Sunkist Boulevard, Ontario, California.

the statistical analysis of the concrete stockpile data presented in your letter satisfies the requirements in Condition 3. In addition, we agree that Stockpile D must be disposed of offsite. Please provide the name of the disposal site to where the entire contents of Stockpile D will be disposed of.

- 2. Condition C.4 (Basement 21 Removal Action [Section 4.2.1 of the RAP] and similar removal actions at other former Sunkist building basements). USEPA has reconsidered Condition C.4. In reference to sampling of soils in Basement 21, USEPA hereby modifies Condition C.4 by approving the approach proposed by Sunkist/BEC in the Application which is illustrated in Figure 10. Sunkist/BEC do not need to submit a revised Figure 10.
- 3. Condition C.5 (Stockpile Sampling and Off-Site Disposal (Section 4.2.2 of the RAP). Condition C.5 applies to existing concrete stockpiles and to stockpiles that may be generated as a result of removing from inside building basements crushed concrete that is already located inside the basements. Condition C.5 does not approve or facilitate generation of new concrete stockpiles except those stockpiles that may be generated due to the reasons explained above. If Buildings 12 and 15 have not been demolished yet, proper characterization of the concrete floors shall be conducted prior to demolition of those buildings to ensure that concrete to be crushed does not exceed the 4.5 mg/kg approved PCB cleanup level. Sunkist/BEC shall propose the sampling approach for concrete characterization before demolition of buildings and other concrete structures to be crushed.
- 4. Condition C.6 (Basement 31 Porous Material Sampling [Section 4.2.3 of the RAP]). The City of Ontario no longer wants to keep the Building 31 basement. Sunkist/BEC has proposed to remove the concrete floor from the basement in Building 31 and to crush the floor with the rest of Building 31. A Building 31 concrete stockpile would be created. Sunkist/BEC proposes not to sample the concrete floor before demolition and is requesting that USEPA modify Condition C.6. USEPA is not modifying Condition C.6. The requirements in Condition C.6 remain unchanged and shall be implemented as established in USEPA's August 19, 2011 conditional approval letter. In addition refer to Condition C.5 in Item 3 above. The TSCA regulations require in-situ sampling.
- 5. Condition C.7 (Soil beneath concrete stockpiles). No, the requirements in Condition C.7 apply to all concrete stockpiles. Therefore, soils beneath all stockpiles shall be properly characterized for PCBs and sample collection conducted as required in Condition C.7.
- 6. Condition C.11 (Extraction and analytical methods). Regarding this issue, one field duplicate sample should be collected every ten (10) samples and not every 20 samples as indicated in the message. Please adjust the number of field duplicate samples.
- 7. Condition C.14 (Areas investigated for non-PCB contamination (Section 4.3 [Non-TSCA Related Soil Removal Activities] of the RAP). USEPA and BEC have discussed the sampling proposed at the "non-PCB" areas. USEPA concurs with the sampling proposed by Sunkist/BEC and

Date: September 6, 2011

Sunkist/BEC shall conduct the sampling as described in the attached Figures 1 (Additional PCB Sampling Plan Area B-5-1), 2 (Additional PCB Sampling Plan Area D-1-1), 6 (Additional PCB Sampling Plan Area L-13), and 9 (Additional PCB Sampling Plan Area 24C).

B. BEC's September 2, 2011 Letter – Porous Media Sampling and Removal Action Plan Waste Water Treatment Plant

BEC's September 2, 2011 letter (Amendment Letter) amends the Application. USEPA is hereby approving the Amendment Letter with conditions and this approval modifies USEPA's August 19, 2011 letter.

- 1. Proposed concrete sampling at Waste Water Treatment Plant (WWTP). USEPA concurs with the revised sampling plan for concrete located in the WWTP. Concrete sampling must be conducted prior to demolition in accordance with all applicable conditions in USEPA's August 19, 2011 letter approving the Application and the attached Figure 3 (Planned Additional Sampling Wastewater Treatment Plant). USEPA and BEC discussed and agreed to the additional concrete sampling at the WWTP on September 1 and 2, 2011.
- 2. Proposed soil sampling at WWTP. USEPA is approving the proposed soil sampling beneath the concrete found to be contaminated with PCBs at the WWTP provided that one additional soil sample be collected 10 feet to the west of the soil sample location proposed outside the concrete area to be cut out and disposed of offsite as "non-TSCA" waste. The attached Figure 7 (Soil Sampling Under Impacted Concrete at WWTP) describes additional soil sampling to be conducted beneath concrete based on currently available concrete sampling results. Depending on the results of the additional concrete sampling to be conducted as required in Condition B.1 above, additional soil samples may be required.
- 3. **Dust monitoring and suppression.** USEPA concurs with Sunkist/BEC's calculations that dust in ambient air shall not exceed 12 micrograms per cubic meter (ug/m³) during demolition and remedial activities. Dust suppression must not generate runoff at the Site and if runoff is generated such runoff must be properly contained and the water tested for PCBs. Depending on the PCB concentration, the water may be used for unrestricted use in accordance with 40 CFR 761.79(b)(1)(iii).

The Amendment Letter refers to TSCA waste and non-TSCA waste. Under TSCA, PCB remediation waste is regulated for disposal at concentrations below 50 milligram/kilogram (mg/kg) and at concentrations equal to or above 50 mg/kg. Soils and concrete contaminated with PCBs at the site are a PCB remediation waste.

We look forward to being of assistance during Sunkist / BEC's implementation of the approved PCB cleanup Application as modified by USEPA's conditions of approval. Please call Carmen D. Santos at 415.972.3360 if you have any questions concerning this conditional approval.

Sincerely,

Jeff Scott, Director Waste Management Division

Enclosures (6)

Cc: Charity Hernandez, City of Ontario Steve Armann, USEPA R9 Carmen Santos, USEPA R9



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION IX

75 Hawthorne Street San Francisco, CA 94105

Via Electronic Mail and U.S. Postal Service Mail

August 19, 2011

Mr. Keith Rudd Sunkist Growers, Inc. Director of Environmental and Technology 531 West Popular Avenue Tipton, CA 93272

Re: Polychlorinated Biphenyls (PCBs), Toxic Substances Control Act (40 CFR 761.61(c)) – USEPA Conditional Approval of "Remedial Action Plan," Former Sunkist Citrus Plant

Dear Mr. Rudd:

The U.S. Environmental Protection Agency Region 9 (USEPA) is approving with conditions the "Remedial Action Plan" (RAP) for the Former Sunkist Citrus Processing Plant at 616 East Sunkist Boulevard in Ontario, California (Sunkist Site) dated May 22, 2011 and prepared by BEC for Sunkist Growers, Inc. The RAP serves as the polychlorinated biphenyls (PCB) risk-based disposal approval application (Application) required in the Toxic Substances Control Act (TSCA) PCB regulations in 40 CFR 761.61(c). The Application is for the Sunkist PCB Cleanup Site (PCS) encompassed within the 11.11-acre Sunkist Site.

USEPA is approving the RAP (Application) under 40 CFR 761.61(c). Among other things, the Application involves additional characterization sampling for PCBs in soils and concrete, cleanup of PCB-contaminated soils via excavation if necessary, offsite disposal of PCB remediation waste (e.g., soils, concrete), and onsite use of concrete with PCB levels equal to or below 4.5 milligrams/kilograms (mg/kg). USEPA is approving a PCB cleanup level for soils and concrete at the Site equal to 4.5 mg/kg total PCBs which was developed by Sunkist / BEC via a site-specific health risk assessment.

We look forward to being of assistance during Sunkist / BEC's implementation of the approved PCB cleanup Application as modified by USEPA's conditions of approval. Please call Carmen D. Santos at 415.972.3360 if you have any questions concerning this conditional approval.

Sincerely

Jeff Scott, Director

Waste Management Division

Keith Rudd

Re: USEPA Conditional Approval – TSCA PCB Cleanup Former Sunkist Citrus Processing Plant, Ontario, California

Date: August 19, 2011

Enclosures (2)

Cc: Steve Armann, USEPA R9 Carmen Santos, USEPA R9



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION IX

75 Hawthorne Street San Francisco, CA 94105

August 19, 2011

USEPA Conditional Approval for Former Sunkist Citrus Processing Plant
616 East Sunkist Boulevard
Ontario, California
TSCA PCB Cleanup Under 40 CFR 761.61(c)

A. Introduction

The U.S. Environmental Protection Agency Region 9 (USEPA) hereby approves with conditions the "Remedial Action Plan" (RAP) for the Former Sunkist Citrus Processing Plant, 616 East Sunkist Boulevard, Ontario, California, dated May 22, 2011 and prepared by Bowyer Environmental Consulting (BEC) for Sunkist Growers, Inc. (Sunkist). Sunkist has submitted the RAP under the Toxic Substances Control Act (TSCA) regulations for polychlorinated biphenyls (PCBs) in 40 CFR 761.61(c) (risk-based PCB cleanup). As such, the RAP is the risk-based disposal approval application required under that section of the TSCA regulations for the cleanup of PCBs. The RAP (Application) addresses additional characterization sampling and cleanup of PCBs at the Former Sunkist Plant in Ontario, California (Sunkist Site).

This approval is effective on the date of this enclosure. Section C below contains the conditions of approval.

Any party cleaning up PCBs from soils and structures must do so consistent with the requirements set forth at 40 CFR 761.61. The TSCA PCB regulations in 40 CFR 761.61 establish PCB cleanup options consisting of self-implementing (40 CFR 761.61(a)), performance-based (40 CFR 761.61(b)), or risk-based (40 CFR 761.61(c)) cleanup alternatives. Depending on site-specific factors, USEPA may approve and require implementation of a PCB cleanup following a hybrid approach that applies requirements from multiple cleanup options.

USEPA is approving the Application with conditions under the TSCA regulatory requirements for PCBs in 40 CFR 761.61(c) and 40 CFR 761.61(a).

- B. Former Sunkist Citrus Processing Plant, Sunkist PCB Cleanup Site, Land Use, Sources of PCB Contamination, and PCB Cleanup
- 1. Sunkist Site and Sunkist PCB Cleanup Site. The Sunkist Site consists of approximately 11.11 acres in the City of Ontario. The Sunkist PCB Cleanup Site (PCS) is located within the Sunkist Site.

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Former Citrus Processing Plant, Ontario, California

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- 2. Current and future land use. According to the Application, the current land use at the Sunkist Site is industrial and the future land use is expected to be industrial. The Sunkist Site operated as a citrus processing plant from 1926 (operated by Sunkists' predecessor Ontario Citrus Exchange) and completed citrus processing operations in 2008. The onsite wastewater treatment plant is still operating at the Site
- 3. Sources of PCB Contamination. Among potential sources of contamination is hydraulic equipment that may have been lubricated with PCB-containing oils. PCB Aroclors 1254 and 1260 have been detected at the site in concrete and soils. In addition, based on a small number of soil samples, dioxin-like PCB congeners were detected at the Site.
- 4. PCB Cleanup. Among other requirements, the conditions of approval for the PCB cleanup at the Sunkist Site require that Sunkist:
 - Submit additional information concerning further characterization of PCBs in concrete stockpiled in certain areas of the PCS and in building basements.
 - Conduct additional soil characterization.
 - Excavate and dispose offsite (consistent with 40 CFR 761.61(a)) soils, concrete, and asphalt
 contaminated with PCBs above the USEPA-approved PCB cleanup level of 4.5 mg / kg. This
 includes any soils contaminated with PCBs above the cleanup level that may be present
 beneath concrete or asphalt.
 - Conduct soil cleanup verification sampling and analysis in accordance with the required SAP (to be approved under 40 CFR 761.61(c)).
 - Verify compliance with the cleanup level via use of USEPA's ProUCL statistical program.
 - Dispose offsite other cleanup wastes in accordance with 40 CFR 761.61(a).
 - Use onsite concrete that is contaminated with PCBs below the cleanup level.
 - Submit for USEPA approval a PCB Cleanup Completion Report.
 - Restrictive covenant recorded in accordance with state law that among other information documents the onsite use of concrete with PCBs below the PCB cleanup level of 4.5 mg/kg.

C. USEPA's Conditions of Approval

This conditional approval does not relieve the owner and the cleanup party from complying with all other applicable federal, state, and local regulations and permits. Sunkist and BEC must comply with the specified PCB cleanup requirements in 40 CFR 761.61(c), PCB remediation waste disposal requirements in 40 CFR 761.61(a), and the approved Application (i.e., RAP) as modified by the conditions of approval herein.

Departure from the approval conditions herein without prior written permission from USEPA may result in the commencement of proceedings to revoke this approval, and/or an enforcement action. Nothing in

this approval bars USEPA from imposing penalties for violations of this approval or for violations of other applicable TSCA PCB requirements or for activities not covered under this approval. This approval only applies to the Sunkist Site. USEPA reserves the right to require additional characterization and/or cleanup of PCBs at the Sunkist Site if new information shows that PCBs remain at the Site above the USEPA-approved PCB cleanup levels or if PCBs are found at other areas of the Sunkist Site.

USEPA is hereby approving the Application as modified by the conditions of approval established below. Sunkist and BEC must implement the Application as modified by these conditions.

In this approval, deadlines are based on a specific number of business days from the date of the approval.

- 1. Sunkist PCB Cleanup Site. The Sunkist PCB Cleanup Site (PCS) is located within the 11.11-acre Sunkist Site and encompasses all the areas of the Sunkist Site investigated for PCBs including and not limited to the former location of certain buildings already demolished and their associated basements as well as the location of buildings and related basements still to be demolished. The PCS also encompasses the areas where stockpiles of concrete derived from the demolition of Site buildings are located. Concrete in these stockpiles contain PCBs at various concentrations.
- 2. PCB cleanup level for soils and concrete. The approved PCB cleanup level for soils and concrete is 4.5 milligrams / kilogram (mg/kg). The PCB cleanup level discussed in the RAP (Application) is 6.5 mg/kg PCBs and this approval modifies the cleanup level in the RAP to 4.5 mg/kg. This approval is based on the health risk assessment conducted for the Sunkist Site as revised based on USEPA's comments on the risk assessment and guidance. The approved PCB cleanup is protective of the offsite residential, industrial, and construction worker exposure scenarios evaluated for receptors in proximity to the Site. The approved PCB cleanup level was developed taking into consideration analytical results for PCB Aroclor and dioxin-like PCB congeners.
- 3. Concrete stockpiles, statistical derivation of an additional number of concrete characterization samples. Within 5 days after the date of this approval, Sunkist / BEC must submit for USEPA approval the revised proposed number of additional concrete samples to be collected from each of several stockpiles (about 21) and building basements at the PCS. These stockpiles are listed in the attached table which is an excerpt from BEC's July 22, 2011 letter (Subject: Risk Assessment / RAP Review and Additional Action Items Former Sunkist Citrus Processing Plant. . .). Properly applied SW-846 statistical methodology shall be employed to calculate the number of additional concrete

¹ The attached electronic mail message from Dr. Patrick Wilson (USEPA R9) to Carmen Santos (USEPA R9), <u>Subject:</u> Former Sunkist Citrus Processing Plant Risk Assessment Review & PCB Remediation Goals briefly summarizes USEPA's risk assessment review. Also, refer to BEC's memo from Dr. Heriberto Robles to Brett Bowyer (BEC), <u>Subject:</u> Derivation of Risk-Based Cleanup Levels for PCBs in Crushed Concrete Addendum dated July 22, 2011 and included in BEC's July 22, 2011 letter to USEPA.

USEPA Conditional Approval Under TSCA, 40 CFR 761.61(c) Remedial Action Plan

Former Citrus Processing Plant, Ontario, California

Date: August 19, 2011

samples. The approved cleanup level of 4.5 mg/kg PCBs shall be used as the regulatory threshold (RT) instead of the 1 mg/kg RT used in the calculations presented in BEC's July 22, 2011 letter. Based on the above, USEPA is requiring that Sunkist / BEC conduct the following steps:

- a. Sunkist / BEC must use the existing data and the current version of ProUCL to separately calculate the distribution-specific 95% upper confidence limit (UCL) on the mean concentration for each stockpile. Stockpiles with UCLs above 4.5 mg/kg PCBs shall be disposed offsite to prevent any exposures to PCBs contained in the concrete from these stockpiles in the future.
- b. For the stockpiles not identified for disposal in Condition C.3.a ("the remaining stockpiles"), the existing concrete stockpile data may be insufficient as to justify onsite use of the remaining concrete. Sunkist / BEC must conduct additional sampling of those stockpiles. The existing data for the remaining stockpiles shall be used to derive the number of additional concrete characterization samples needed for each of the remaining stockpiles using the statistical method specified in SW-846 and a regulatory threshold of 4.5 mg/kg and not of 1 mg/kg. A random sampling approach shall be used to collect the additional concrete samples needed from each remaining stockpile.
- c. Sunkist / BEC shall use the existing PCB characterization data for the remaining stockpiles together with the new data (required in Condition C.3.b) and the current version of ProUCL to calculate a separate UCL for each remaining stockpile. Sunkist / BEC must dispose offsite any stockpiles with a UCL above the 4.5 mg/kg PCB cleanup level (regulatory threshold).

Sunkist / BEC proposed in Section 3.1 (PCB Removals) of the RAP to remove for offsite disposal the crushed concrete in Basement 21, and in stockpiles W-N, D, 10, 16, 17, and 18 (including 18a and 18b). USEPA approves the offsite disposal of the concrete in Basement 21 and in the mentioned stockpiles in context to the approved PCB cleanup level of 4.5 mg/kg.

- 4. Basement 21 Removal Action (Section 4.2.1 of the RAP) and similar removal actions at other former Sunkist building basements. USEPA approves of the proposed remedial action as modified by this condition below and Condition C.3 above. USEPA is approving under 40 CFR 761.61(a) the soil sampling to be conducted in Basement 21 and any other basement from which crushed concrete will be removed.
 - a. Crushed concrete containing PCBs above the cleanup level has been placed in the basement of former Building 21. After the crushed concrete is removed from the basement, Sunkist / BEC proposes to collect composite soil samples following the procedures in 40 CFR 761.289(b)(1)(i). However, those sampling procedures do not apply. Instead, Sunkist / BEC shall collect the composite soil samples following the sampling approach in 40 CFR 761.289(b)(1)(ii), (b)(1)(ii)(A), (b)(1)(ii)(B), and (b)(1)(ii)(C) or equivalent method. Within 10 days after the date of this approval, Sunkist / BEC shall resubmit Figure 10 depicting the soil sampling locations in

the Building 21 basement and such locations shall be determined based on the sampling method in this regulation.

- 5. Stockpile Sampling and Off-Site Disposal (Section 4.2.2 of the RAP). Sampling of concrete from building basements and in above ground stockpiles must be conducted consistent with the method established in Condition C.3 above.
- 6. Basement 31 Porous Material Sampling (Section 4.2.3 of the RAP). USEPA approves of the sampling approach proposed for the concrete floor in Basement 31 provided the basement is not filled with bulk concrete (crushed or uncrushed). Soil samples shall be collected at concrete sampling locations where PCBs are equal to or higher than 4.5 mg/kg PCBs. One additional soil sample shall be collected in the lift L-42 area for a minimum of three soil samples to be collected from that area for PCB analysis. In addition, if the Basement 31 is filled with bulk concrete, the floor of this basement shall be sampled following the requirement in Condition C.4 above.
- 7. Soil beneath concrete stockpiles. Sunkist / BEC must sample surface soils (0 to 3 inches below ground surface) beneath all the concrete stockpiles to verify that PCBs are not present above the approved PCB cleanup level. Within 10 days after the date of this approval, Sunkist / BEC shall submit for review and approval the sampling approach to make this verification.
- 8. Decontamination of Movable Equipment, Tools, and Sampling Equipment Contaminated by PCBs. Equipment not covered in the USEPA Region 1 SOP must be decontaminated following the requirements in 40 CFR 761.79(c)(2).
- 9. Off-site disposal of decontamination residues, PCB remediation waste, and cleanup wastes. Decontamination residues and cleanup wastes must be disposed based on their original PCB concentration in accordance with 40 CFR 761.79(g)(2), (g)(6), and 40 CFR 761.61(a)(5), (a)(5)(i), (a)(5)(iii), and (a)(5)(v). Concrete and/or other porous surfaces(s) contaminated with PCBs above the PCB cleanup level to be approved must be disposed of as bulk PCB remediation waste in accordance with the requirements in 40 CFR 761.61(a)(5)(i)(B)(2)(ii), (a)(5)(v)(A), and (a)(5)(i)(B)(2)(iii). Disposal of all wastes (e.g., personal protective equipment, soils, concrete) generated during cleanup of PCBs must be in compliance with all applicable federal, state, and local regulations.
- 10. Dust management plan. Within 10 days after the date of this approval, BEC must submit a dust management plan that includes ambient air sampling and it is designed to be protective of workers and the public when conducting any activity at the Site that generates dust such as during crushing of PCB-contaminated concrete, demolition of above ground structures, and demolition of any remaining below ground structures at the Site. The dust management plan shall also be implemented during movement and removal of concrete from the concrete stockpiles and during movement of soils. As part of the dust management plan Sunkist / BEC shall propose a concentration (in mg/m³)

of dust that is protective of all receptors. Workers must be adequately protected to prevent exposure to PCBs.

11. Extraction and analytical methods. Field and laboratory quality control samples. Under the TSCA PCB regulations the applicant has the option to choose either the Soxhlet extraction method (USEPA Method 3540C) or the Ultrasonic method (USEPA Method 3550C). The Soxhlet extraction method is preferred by USEPA for both concrete and soil samples. If necessary, post extraction and pre-analysis sample cleanup (e.g., USEPA Methods 3665A [sulfuric acid], 3620C [florisil column], 3640A [Gel Permeation Column, GPC]) procedures must be considered if matrix interferences are suspected that could increase analytical method detection limits and compromise comparisons of analytical results to the cleanup levels required in this approval.

Within five (5) days after the date of this approval and before starting sampling at the PCS Sunkist / BEC shall submit a description of quality control (QC) procedures that will be implemented in the field during sample collection (characterization and cleanup verification sampling) and number and type of field QC (e.g., duplicates) samples to be collected for soil and concrete. This description shall also identify the laboratory QC samples (i.e., surrogate spikes, matrix spikes, equipment blanks) that will be prepared and analyzed by the contracted analytical laboratory together with the site samples.

12. Notification of PCB activity. Sunkist / BEC must comply with the notification and manifest requirements of 40 CFR 761, Subpart K when storing onsite, transporting, and disposing of PCBs offsite. Sunkist / BEC must comply with the requirements in 40 CFR 761.65(c)(1) and Sunkist / BEC's storage of PCB waste must not trigger the more stringent requirements in 40 CFR 761.65(b) and 761.65(c)(7) to be exempted from filing the Notification of PCB Activity as a generator of PCB waste.

The transporter of PCB remediation waste from the Sunkist Site must submit to USEPA Headquarters a Notification of PCB Activity Form before transporting the waste to the offsite disposal facility. Sunkist / BEC must dispose offsite all concrete that contains PCBs above the approved cleanup level without further delay. In accordance with 40 CFR 761.61(c), USEPA is extending the storage of PCB remediation waste at the site up to an additional 90 days beyond the 180 days established in 40 CFR 761.65(c)(9). Storage of waste containing PCBs above the cleanup level has already exceeded the 180 days established in 40 CFR 761.65(c)(9).

13. Demonstration of compliance with concrete and soil cleanup level. Sunkist / BEC will calculate the distribution-specific 95% confidence limit of the mean (i.e., the exposure-point concentration) of the analysis results for bulk concrete characterization samples, soil characterization samples, and soil cleanup verification samples separately using USEPA's ProUCL statistical program and compare that exposure point concentration (EPC) for soils and concrete to the cleanup level.

For concrete in stockpiles and / or placed in former building basements, Sunkist / BEC must refer to Condition C.3 above.

If the EPC for soils is higher than the cleanup level, Sunkist / BEC must conduct additional cleanup of soils and collect cleanup verification samples until the EPC calculated via ProUCL using this additional data is below the cleanup level. If the cleanup level is not achieved after further soil cleanup, Sunkist / BEC shall confer with USEPA as to the next steps that it will take to resolve the matter.

- 14. Areas investigated for non-PCB contamination (Section 4.3 [Non-TSCA Related Soil Removal Activities] of the RAP). Sunkist / BEC have indicated the source of PCBs at the Sunkist Site is unknown. Investigations for non-PCB contaminants have occurred in Area 24C, Area D-5-1, Area L-13-3, Area B-5-1, and Area D-1-1 (collectively referred to as "Non-PCB Areas") and petroleum hydrocarbons and polyaromatic hydrocarbons (PAHs) are present at some of these areas. Given Sunkist's uncertainty on the source of PCBs and the presence of PAHs and petroleum hydrocarbons, USEPA is requesting that cleanup verification sampling to be conducted in the "Non-PCB Areas" include testing for PCBs. Within 15 days after the date of this letter propose the number of soil samples that Sunkist / BEC will collect to demonstrate PCBs are not present in the "Non-PCB Areas" in concentrations above the USEPA-approved PCB cleanup level.
- 15. PCB Cleanup Completion Report. Within 60 days after Sunkist / BEC demonstrate that residual PCBs in soils are equal to or below the USEPA-approved PCB cleanup level, Sunkist / BEC must submit a PCB Cleanup Completion Report for USEPA approval (under 40 CFR 761.61(c)). This report must demonstrate compliance with all the conditions of approval and applicable TSCA PCB regulations in addition to applicable state and local regulations. Sunkist / BEC shall refer to 40 CFR 761.61(a)(9) and 761.125(c)(5) as a guideline to prepare the report and such guideline represents minimum requirements for the required PCB Cleanup Report. This report must provide all relevant sampling and analysis data and justifications demonstrating that Sunkist / BEC achieved the USEPA approved PCB cleanup level and that it met the conditions of approval.
- 16. **Deed Restriction.** Within 20 days after the date of this letter, confer with USEPA concerning the deed restriction that will be recorded for the property and in context to the PCB cleanup.



Former Sunkist Citrus Processing Plant Risk Assessment Review & PCB Remediation Goals

Patrick Wilson to: Carmen Santos

08/05/2011 06:00 PM

From:

Patrick Wilson/R9/USEPA/US

To:

Carmen Santos/R9/USEPA/US@EPA

Good Afternoon Carmen,

We have completed our review of the human health risk assessment reports and supplemental analyses submitted in support of remedial activities taken at the Former Sunkist Citrus Processing Facility in Ontario, Calif. As you know, this analysis was conducted by Bowyer Environmental Consulting for the property located at 616 Sunkist Street in Ontario. The objectives of the analysis were to assess the likelihood and magnitude of human health impacts from exposure to site-related contaminants. In addition, the risk analysis was designed to establish site-specific cleanup concentrations for impacted media which is considerate and protective of the receptor-specific exposure scenarios applied to this site.

This site is contaminated with a broad suite of environmental contaminants. U.S. EPA has retained direct authority over the assessment & cleanup of media impacted by polychlorinated biphenyls (PCBs). Media contaminated by other chemical constituents is regulated by the Hazardous Materials Division - Site Remediation/Local Oversight Program San Bernardino County Fire Department. This local agency receives technical risk assessment support from California-EPA's Office of Environmental Health Hazard Assessment (OEHHA).

As you know, the risk analysis in support of PCB impacted media has undergone several revisions. A number of these revisions have been a direct result of meetings, site visits and conference calls between representatives of Sunkist & EPA. For instance, EPA has recommended that Sunkist sample impacted media and subject it to analysis for the dioxin-like or coplanar PCB congener fraction in order to better characterize the full dimension of risk. As a result, a subset of PCB samples were analyzed not only based upon their aroclor composition, but also for their dioxin-like or coplanar congener content. In addition, EPA has recommended that the industrial worker exposure scenario remain considerate of the entire fraction of contaminated crushed concrete - rather than the 50% exposure fraction initially proposed. These examples are illustrative of specific procedural & methodological recommendations which ultimately resulted in a more conservative estimate of putative impacts and a more conservative cleanup goal.

Our review has found that the revised PCB cleanup concentration of 4.5 mg/kg for on-site soils and concrete is indeed, considerate & protective of the residential, industrial and construction worker exposure scenarios evaluated for receptors proximate to the site. We have independently confirmed the scenario-specific risk estimates for both the cancer endpoint and the non-cancer or systemically-toxic hazard characterization. We have found & confirmed that the carcinogenic risk from exposure to PCB impacted soils & concrete does not exceed Cal-EPA's Department of Toxic Substances Control (DTSC) risk management acceptability criteria for industrial sites of 1E-5. We have also confirmed that the non-cancer hazard from exposure to impacted media at the cleanup goal does not exceed the risk management acceptability criteria of unity (1).

Sunkist has conducted a number of removal operations at the site for impacted soils and concrete. The resulting exposure point concentration (EPC), or more accurately distribution-specific upper confidence limit on the mean (UCL), should therefore not exceed the proposed cleanup goal of 4.5 ppm total PCBs aroclors. It should be noted that this cleanup goal is germane to impacted media remaining on-site and protective of on-site workers consistent with a site-specific industrial exposure scenario(s). Off-site residents located directly adjacent to the former facility are also considered receptors subject to a number of complete exposure pathways. Potential impacts to this receptor group was assessed by application of an Agency-unapproved air dispersion model which estimated the fraction of contaminated dust impacting residential locations. We believe this model is inherently uncertain, has not been subject to Agency

approval or validation, yet is likely to overestimate the fraction of dust impacting residential receptors because of the stability class input applied, and because of the plume dispersion characteristics unique to this model. We strongly recommend that any and all future modelling efforts in this regard be conducted with the Agency's preferred and recommended air dispersion & deposition model, *AERMOD*.



Sunkist Ontario - Schedule Brett Bowyer

to:

Carmen Santos, Patrick Wilson 06/28/2011 02:18 PM

Cc:

"Rudd, Keith" Hide Details

From: "Brett Bowyer"

 brettbowyer@bowyerenvironmental.com>

To: Carmen Santos/R9/USEPA/US@EPA, Patrick Wilson/R9/USEPA/US@EPA

Cc: "'Rudd, Keith'" < krudd@Sunkistgrowers.com>

Greetings,

San Bernardino County has approved the HRRA and RAP without conditions. As such, we are preparing to start the non-PCB related remediation activities and demo program next week. The following is a summary of the ongoing issues related to EPA's review, along with key deliverable dates. I've highlighting in red the items that the EPA needs to address.

- Human Health Risk Assessment (HHRA) Submitted to EPA on April 13, 2011
- 2. Remedial Action Plan (RAP) Submitted to EPA on May 22, 2011
- 3. Initial comments to HHRA and RAP by EP Received on
- 4. Addendum to risk assessment based on EPA initial comments Resubmitted to EPA on June 24, 2011
- 5. Sampling plan for porous media at Waste water treatment plant submitted to EPA on June 22, 2011 Approved by EPA on June 22, 2011
- Dust suppression and monitoring procedures Submitted to EPA on June 27, 2011
- 7. EPA to review porous media data collected from Building 31 (submitted as part of the RAP) to assess if sufficient data has been collected so that demo can proceed on Building 31 by June 30, 2011
- 8. Clarification associated with PCB Activity Report Question submitted to the EPA on June 28, 2011
- EPA to review data and concur that sufficient samples have been collected from media of concern, which are soil and crushed concrete (contains asphalt) – EPA to provide comments by June 30, 2011
- 10. EPA to approve, with or without conditions the HHRA and RAP by June 30, 2011
- 11. Porous media report for wastewater treatment plant To be submitted to EPA by July 6, 2011

If you have any questions, or if I've missed anything, please do not hesitate to call or email me.

Thanks.

Brett Bowyer, P.G.
Bowyer Environmental Consulting, Inc.
17011 Beach Boulevard, Suite 900
Huntington Beach, CA 92647
Office: (877) BEC-INC-0

(877) 232-4620 Cell: (714) 878-7191 FAX: (714) 840-4963

brettbowyer@bowyerenvironmental.com www.bowyerenvironmental.com

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RE: Sunkist Growers - Revised Covenant to Restrict Use of Property

Carmen Santos to: Woltmann, Charles

10/24/2012 06:56 PM

Brett Bowyer, "Brundage, Curtis", Ivan Lieben,

"keithrudd@comcast.net", Michael Grant, "Marlo, Michelle"

Bcc: Steve Armann

From:

Carmen Santos/R9/USEPA/US

To:

"Woltmann, Charles" < cwoltmann@Sunkistgrowers.com>,

Cc:

Brett Bowyer
 brettbowyer@bowyerenvironmental.com>, "Brundage, Curtis"

<cbrundage@sbcfire.org>, Ivan Lieben/R9/USEPA/US@EPA, "keithrudd@comcast.net"
<keithrudd@comcast.net>, Michael Grant <Michael.Grant@bbklaw.com>, "Marlo, Michaele"

Bcc:

Steve Armann/R9/USEPA/US@EPA



10 24 2012 USEPA Revised Environmental Restriction compare v5 to v4_EPAfinalcomments_.docx

Dear Mr. Charles Woltmann:

Attached is the file containing the draft covenant for the Sunkist property and including USEPA's final comments.

In addition to other changes, we modified the following sentence in Section 4.02 based on our October 2, 2012 letter approving the Remediation Report for the Sunkist site. USEPA's letter approving the Sunkist remediation report states in reference to the concrete from onsite demolitions that:

"The concrete that originated from the demolition of onsite structures can be reused within the boundaries of the Sunkist site consistent with TSCA use authorizations in 40 CFR 761.30(u) (Use of decontaminated materials)."

Covenant Original Sentence:

"4.02... The Owner may also move buried or surface concrete for another onsite use or offsite use, but only to the extent that the PCB concentrations in the concrete do not exceed the allowable limit for the proposed alternative onsite or offsite use."

<u>Covenant - USEPA Revised Sentence as it appears in the current attached draft of the Covenant:</u>

"4.02... The Owner may also move buried or surface concrete for another onsite use or offsite-use, but only to the extent that the PCB concentrations in the concrete do not exceed the allowable limit for the proposed alternative onsite or offsite use. EPA shall be notified of such proposed alternative."

Please call me if you have any questions concerning the above revised sentence. Please end us the cleaned final version of the covenant prior to recordation.

Thank you for your courtesies and patience.

Sincerely,

Carmen D. Santos **PCB** Coordinator RCRA Corrective Action Office (WST-5) Waste Management Division **USEPA Region 9** 415.972.3360

santos.carmen@epa.gov

"Think left and think right and think low and think high. Oh, the thinks you can think up if only you try!" Dr. Seuss

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"Woltmann, Charles"

Dear Ms. Santos:

Attached please find... 10/24/2012 10:04:11 AM

From:

"Woltmann, Charles" < cwoltmann@Sunkistgrowers.com>

To:

Carmen Santos/R9/USEPA/US@EPA,

Cc:

Ivan Lieben/R9/USEPA/US@EPA, Michael Grant < Michael.Grant@bbklaw.com>,

"keithrudd@comcast.net" <keithrudd@comcast.net>, Brett Bowyer

<bre>cbrettbowyer@bowyerenvironmental.com>, "Marlo, Michelle" <Michelle.Marlo@alston.com>,

"Brundage, Curtis" <cbrundage@sbcfire.org>

Date:

10/24/2012 10:04 AM

Subject:

RE: Sunkist Growers - Revised Covenant to Restrict Use of Property

Dear Ms. Santos: Attached please find a marked copy of the proposed Covenant showing the changes that we made in response to your and Mr. Lieben's latest comments sent to us yesterday afternoon. We believe that in addition to our other changes that you reviewed yesterday, we have incorporated all your and his comments as you and he wished. Please let us know ASAP if we are mistaken in that regard.

Also attached is a clean copy of the Covenant in the exact form that we intend to execute and record by tomorrow.

Thank you again for working with us to produce a Covenant document satisfactory to all concerned.

Sincerely,

Charles L. Woltmann

Sr. Vice President, Law and General Counsel Sunkist Growers Inc. 14130 Riverside Dr. Sherman Oaks, CA 91423 PO Box 7888 Van Nuys, CA. 91409-7888

Tel: (818) 379-7532 Cell: (323) 385-7061 Fax: (818) 379-7381

cwoltmann@sunkistgrowers.com



From: Santos.Carmen@epamail.epa.gov [mailto:Santos.Carmen@epamail.epa.gov]

Sent: Tuesday, October 23, 2012 4:12 PM

To: Woltmann, Charles

Cc: Lieben.Ivan@epamail.epa.gov

Subject: Sunkist Growers - Revised Covenant to Restrict Use of Property

Dear Mr. Charles Woltmann:

This message contains an additional revision to the draft covenant file that I sent you and that is attached to the message forwarded below.

The revision is for Provision 7.03 under Article VII. Please add to 7.03 that "Covenantor shall provide a copy of the recorded Covenant to EPA."

Thank you for your courtesies.

Sincerely,

Carmen D. Santos PCB Coordinator RCRA Corrective Action Office (WST-5) Waste Management Division USEPA Region 9 415.972.3360

santos.carmen@epa.gov

"Think left and think right and think low and think high. Oh, the thinks you can think up if only you try!" Dr. Seuss

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---- Forwarded by Carmen Santos/R9/USEPA/US on 10/23/2012 03:58 PM -----

From: Carmen Santos/R9/USEPA/US

To: "Woltmann, Charles" < cwoltmann@Sunkistgrowers.com>,

Cc: Brett Bowyer brett Bowyer brundage@sbcfire.org, Ivan

Lieben/R9/USEPA/US@EPA, "keithrudd@comcast.net" <keithrudd@comcast.net>, Michael Grant <Michael.Grant@bbklaw.com>,

"Marlo, Michelle" < Michelle. Marlo@alston.com>

Date: 10/23/2012 03:45 PM

Subject: Re: Sunkist Growers - Revised Covenant to Restrict Use of Property

Dear Mr. Charles Woltmann:

Attached is the draft covenant with our revisions annotated on the body of the covenant. Please send us the revised draft for review. If you have any questions regarding our revisions, please call Ivan Lieben, Assistant Regional Counsel, at 415.972.3914.

Thank you for your courtesies.

Sincerely,

Carmen D. Santos
PCB Coordinator
RCRA Corrective Action Office (WST-5)
Waste Management Division
USEPA Region 9
415.972.3360

santos.carmen@epa.gov

"Think left and think right and think low and think high. Oh, the thinks you can think up if only you try!" Dr. Seuss

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From: "Woltmann, Charles" <cwoltmann@Sunkistgrowers.com>

To: Carmen Santos/R9/USEPA/US@EPA, Ivan Lieben/R9/USEPA/US@EPA, "Brundage, Curtis" <cbrundage@sbcfire.org>,

Cc: Michael Grant < Michael.Grant@bbklaw.com>, Brett Bowyer < brettbowyer@bowyerenvironmental.com>,

"keithrudd@comcast.net" <keithrudd@comcast.net>, "Marlo, Michelle" <Michelle.Marlo@alston.com>

Date: 10/23/2012 10:08 AM

Subject: Sunkist Growers - Revised Covenant to Restrict Use of Property

Everyone: Attached are a clean copy and a marked copy of the above-referenced Covenant. The marked copy shows the changes that we have made to the prior draft. These revisions include those intended to satisfy Ms. Santos's comments made to us yesterday by telephone.

The attached document also names the EPA as a third-party beneficiary, and includes provisions for the EPA's benefit consistent with the sample document that Mr. Lieben sent us last week.

We ask that you review the attached document ASAP, and confirm to us that it is now ready for

signature and recordation by Sunkist Growers.

Thank you again for your help and cooperation.

Sincerely,

Charles L. Woltmann

Sr. Vice President, Law and General Counsel Sunkist Growers Inc.
14130 Riverside Dr.
Sherman Oaks, CA 91423
PO Box 7888 Van Nuys, CA. 91409-7888

Tel: (818) 379-7532 Cell: (323) 385-7061 Fax: (818) 379-7381

cwoltmann@sunkistgrowers.com



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PCBs: Sunkist, Ontario - Latest Risk Calculations Carmen Santos to: brettbowyer

06/29/2011 05:57 PM

Hello Brett:

We have completed our review of the latest revisions made to the risk calculations.

We still have issues with the risk assessment calculations and in specific with the risk calculations for the industrial worker. We do not agree with setting the fraction of exposure to crushed concrete for the industrial worker to 50% of the UCL. Therefore, we request the calculation be revised by setting the fraction of exposure to 100%. The risk driver is the industrial worker and associated non-cancer effects. Please resubmit a recalculated cleanup level for concrete that is considerate of 100% exposure and non-cancer effects for the industrial worker. We would like to proceed with approval of the risk-based Application as soon as the requested calculations are submitted. Also, as you may recall, from the beginning of our conversations regarding the risk assessment we made it clear that as a policy we treat crushed concrete as soil when calculating the risk of PCBs from exposure to this material. Please submit the requested revised calculations by July 6 at latest, or sooner if possible.

Thank you for your courtesies and we look forward to receiving the recalculated cleanup level for crushed concrete.

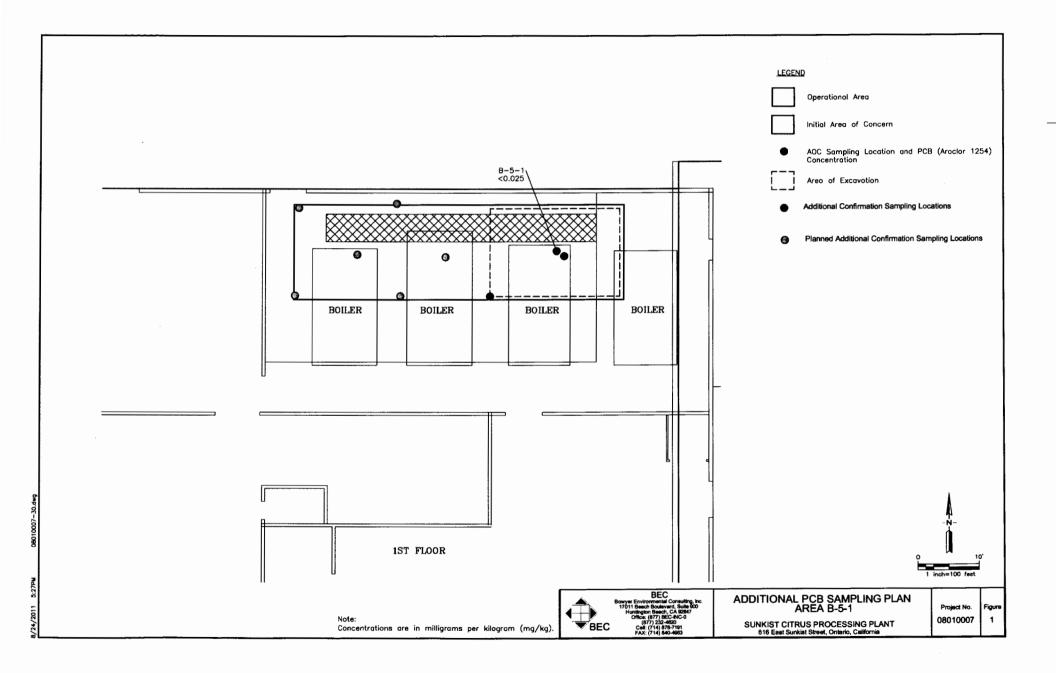
Sincerely,

Carmen

Carmen D. Santos
PCB Coordinator
RCRA Corrective Action Office (WST-5)
Waste Management Division
USEPA Region 9
415.972.3360
santos.carmen@epa.gov

"Failure is simply the opportunity to begin again, this time more intelligently." Henry Ford

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Cimarron Project Area

Sunkist Historic District

Alta Advanced Technologies

The City of Ontario is proud to announce the high-tech manufacturing corporation; Alta Advanced Technologies has recently relocated their headquarters from Claremont to the former Sunkist Research and Development Building located at 760 E. Sunkist in Ontario. Investing more than \$4 million in building acquisition and improvements, President Steven Boland truly believes Ontario is the premier City in Southern California to do business.

Alta Advanced Technologies, employing close to 50 people, specializes in the design and manufacturing of Ultra-Violet and Infra-Red Lamps and Power Systems for medical instrumentation. Started in 1988, Alta has grown into a high quality lamp and systems manufacturer dedicated to providing superior products by constant quality improvement.

As part of the Cimarron Project Area, the Ontario Redevelopment Agency was proud to assist Alta Advance Technologies with funds to help make building improvements necessary to facilitate the move. The Agency looks forward to further new development in this area making it a hub for entrepreneurs and additional high technology manufacturing.

Sunkist Fruit Packing and Processing Facility

The Ontario Redevelopment Agency is currently in escrow to purchase approximately 8 acres of the former Sunkist Fruit Packing Distribution Center at the corner of Sunkist and Campus Avenues in Ontario. Demolition is underway to provide a clean, debris-free site by the close of escrow late fall 2010. The water tower, a historic landmark will be preserved. In anticipation of the elimination of the facility, the Ontario Redevelopment Agency included the plant in its Cimarron Project Area in 2007.

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Sunkist Ontario - Initial Response to Conditional Approval of RAP Brett Bowyer

to:

Carmen Santos 08/25/2011 12:24 PM

Cc:

Steve Armann, "Keith Rudd"

Hide Details

From: "Brett Bowyer"

 brettbowyer@bowyerenvironmental.com>

To: Carmen Santos/R9/USEPA/US@EPA

Cc: Steve Armann/R9/USEPA/US@EPA, "Keith Rudd" < krudd@sunkistgrowers.com>

History: This message has been forwarded.

2 Attachments





0825111 Figures [Compatibility Mode].pdf 08-23-2011 Stockpile Stats Summary Table.xls

Hello Carmen,

Per the EPA conditional approval of the RAP, we are sending you responses to specific comments (Comment No. 3 and No. 11) within the five day period specified. In addition, we are providing a response to Condition No. 14, as we need to proceed with the additional sampling of the non-PCB containing areas immediately in order to maintain the critical path on the demolition schedule. The original comments and our response are provided as follows.

3. Concrete stockpiles, statistical derivation of an additional number of concrete characterization samples. Within 5 days after the date of this approval, Sunkist/BEC must submit for USEPA approval the revised proposed number of additional concrete samples to be collected from each of several stockpiles (about 21) and building basements at the PCS. These stockpiles are listed in the attached table which is an excerpt from BEC's July 22, 2011 letter (Subject: Risk Assessment / RAP Review and Additional Action Items Former Sunkist Citrus Processing Plant...). Properly applied SW-846 statistical methodology shall be employed to calculate the number of additional concrete samples. The approved

concur or provide comment on these proposed plans as soon as possible, as the sampling will need to occur this week in order to maintain our schedule.

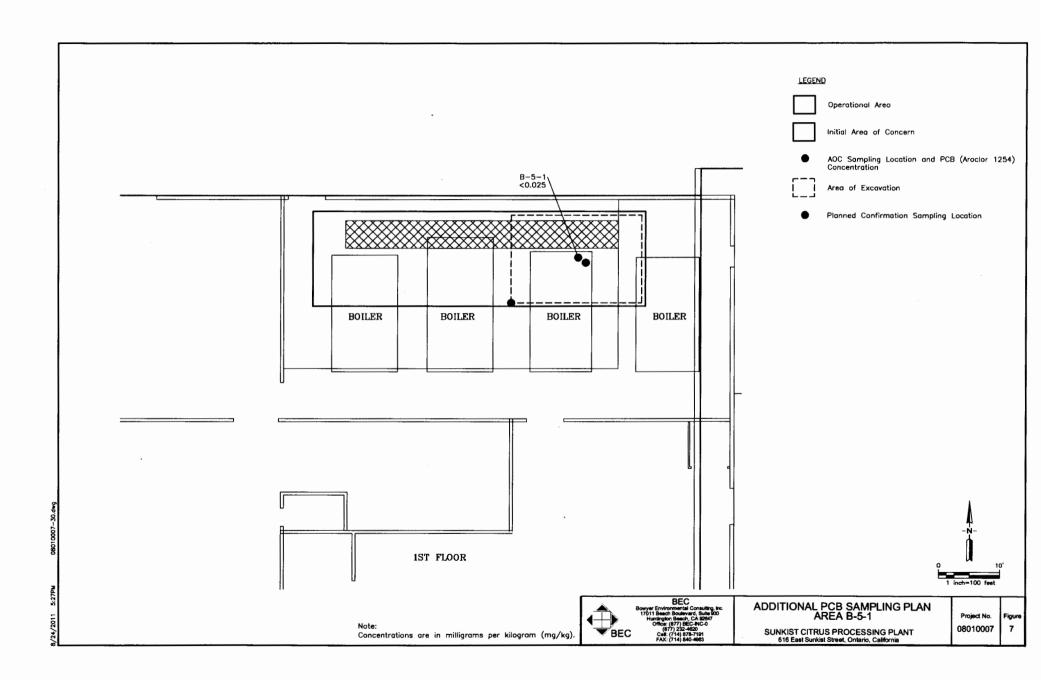
We will be providing additional responses to the Conditional approval letter in the near future.

Thank you.

Brett Bowyer, P.G. Bowyer Environmental Consulting, Inc. 17011 Beach Boulevard, Suite 900 Huntington Beach, CA 92647 Office: (877) 232-4620

Cell: (714) 878-7191 FAX: (714) 840-4963

www.bowyerenvironmental.com



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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION IX

75 Hawthorne Street San Francisco, CA 94105

Via Electronic Mail and U.S. Postal Service Mail

August 19, 2011

Mr. Keith Rudd
Sunkist Growers, Inc.
Director of Environmental and Technology
531 West Popular Avenue
Tipton, CA 93272

Re: Polychlorinated Biphenyls (PCBs), Toxic Substances Control Act (40 CFR 761.61(c)) – USEPA Conditional Approval of "Remedial Action Plan," Former Sunkist Citrus Plant

Dear Mr. Rudd:

The U.S. Environmental Protection Agency Region 9 (USEPA) is approving with conditions the "Remedial Action Plan" (RAP) for the Former Sunkist Citrus Processing Plant at 616 East Sunkist Boulevard in Ontario, California (Sunkist Site) dated May 22, 2011 and prepared by BEC for Sunkist Growers, Inc. The RAP serves as the polychlorinated biphenyls (PCB) risk-based disposal approval application (Application) required in the Toxic Substances Control Act (TSCA) PCB regulations in 40 CFR 761.61(c). The Application is for the Sunkist PCB Cleanup Site (PCS) encompassed within the 11.11-acre Sunkist Site.

USEPA is approving the RAP (Application) under 40 CFR 761.61(c). Among other things, the Application involves additional characterization sampling for PCBs in soils and concrete, cleanup of PCB-contaminated soils via excavation if necessary, offsite disposal of PCB remediation waste (e.g., soils, concrete), and onsite use of concrete with PCB levels equal to or below 4.5 milligrams/kilograms (mg/kg). USEPA is approving a PCB cleanup level for soils and concrete at the Site equal to 4.5 mg/kg total PCBs which was developed by Sunkist / BEC via a site-specific health risk assessment.

We look forward to being of assistance during Sunkist / BEC's implementation of the approved PCB cleanup Application as modified by USEPA's conditions of approval. Please call Carmen D. Santos at 415.972.3360 if you have any questions concerning this conditional approval.

Sincerg

Jeff Scott, Director

Waste Management Division

Keith Rudd

Re: USEPA Conditional Approval – TSCA PCB Cleanup Former Sunkist Citrus Processing Plant, Ontario, California Date: August 19, 2011

Enclosures (2)

Cc: Steve Armann, USEPA R9 Carmen Santos, USEPA R9



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION IX

75 Hawthorne Street San Francisco, CA 94105

August 19, 2011

USEPA Conditional Approval for Former Sunkist Citrus Processing Plant 616 East Sunkist Boulevard Ontario, California TSCA PCB Cleanup Under 40 CFR 761.61(c)

A. Introduction

The U.S. Environmental Protection Agency Region 9 (USEPA) hereby approves with conditions the "Remedial Action Plan" (RAP) for the Former Sunkist Citrus Processing Plant, 616 East Sunkist Boulevard, Ontario, California, dated May 22, 2011 and prepared by Bowyer Environmental Consulting (BEC) for Sunkist Growers, Inc. (Sunkist). Sunkist has submitted the RAP under the Toxic Substances Control Act (TSCA) regulations for polychlorinated biphenyls (PCBs) in 40 CFR 761.61(c) (risk-based PCB cleanup). As such, the RAP is the risk-based disposal approval application required under that section of the TSCA regulations for the cleanup of PCBs. The RAP (Application) addresses additional characterization sampling and cleanup of PCBs at the Former Sunkist Plant in Ontario, California (Sunkist Site).

This approval is effective on the date of this enclosure. Section C below contains the conditions of approval.

Any party cleaning up PCBs from soils and structures must do so consistent with the requirements set forth at 40 CFR 761.61. The TSCA PCB regulations in 40 CFR 761.61 establish PCB cleanup options consisting of self-implementing (40 CFR 761.61(a)), performance-based (40 CFR 761.61(b)), or risk-based (40 CFR 761.61(c)) cleanup alternatives. Depending on site-specific factors, USEPA may approve and require implementation of a PCB cleanup following a hybrid approach that applies requirements from multiple cleanup options.

USEPA is approving the Application with conditions under the TSCA regulatory requirements for PCBs in 40 CFR 761.61(c) and 40 CFR 761.61(a).

- B. Former Sunkist Citrus Processing Plant, Sunkist PCB Cleanup Site, Land Use, Sources of PCB Contamination, and PCB Cleanup
- 1. Sunkist Site and Sunkist PCB Cleanup Site. The Sunkist Site consists of approximately 11.11 acres in the City of Ontario. The Sunkist PCB Cleanup Site (PCS) is located within the Sunkist Site.

- 2. Current and future land use. According to the Application, the current land use at the Sunkist Site is industrial and the future land use is expected to be industrial. The Sunkist Site operated as a citrus processing plant from 1926 (operated by Sunkists' predecessor Ontario Citrus Exchange) and completed citrus processing operations in 2008. The onsite wastewater treatment plant is still operating at the Site
- 3. Sources of PCB Contamination. Among potential sources of contamination is hydraulic equipment that may have been lubricated with PCB-containing oils. PCB Aroclors 1254 and 1260 have been detected at the site in concrete and soils. In addition, based on a small number of soil samples, dioxin-like PCB congeners were detected at the Site.
- 4. PCB Cleanup. Among other requirements, the conditions of approval for the PCB cleanup at the Sunkist Site require that Sunkist:
 - Submit additional information concerning further characterization of PCBs in concrete stockpiled in certain areas of the PCS and in building basements.
 - Conduct additional soil characterization.
 - Excavate and dispose offsite (consistent with 40 CFR 761.61(a)) soils, concrete, and asphalt
 contaminated with PCBs above the USEPA-approved PCB cleanup level of 4.5 mg / kg. This
 includes any soils contaminated with PCBs above the cleanup level that may be present
 beneath concrete or asphalt.
 - Conduct soil cleanup verification sampling and analysis in accordance with the required SAP (to be approved under 40 CFR 761.61(c)).
 - Verify compliance with the cleanup level via use of USEPA's ProUCL statistical program.
 - Dispose offsite other cleanup wastes in accordance with 40 CFR 761.61(a).
 - Use onsite concrete that is contaminated with PCBs below the cleanup level.
 - Submit for USEPA approval a PCB Cleanup Completion Report.
 - Restrictive covenant recorded in accordance with state law that among other information documents the onsite use of concrete with PCBs below the PCB cleanup level of 4.5 mg/kg.

C. USEPA's Conditions of Approval

This conditional approval does not relieve the owner and the cleanup party from complying with all other applicable federal, state, and local regulations and permits. Sunkist and BEC must comply with the specified PCB cleanup requirements in 40 CFR 761.61(c), PCB remediation waste disposal requirements in 40 CFR 761.61(a), and the approved Application (i.e., RAP) as modified by the conditions of approval herein.

Departure from the approval conditions herein without prior written permission from USEPA may result in the commencement of proceedings to revoke this approval, and/or an enforcement action. Nothing in

this approval bars USEPA from imposing penalties for violations of this approval or for violations of other applicable TSCA PCB requirements or for activities not covered under this approval. This approval only applies to the Sunkist Site. USEPA reserves the right to require additional characterization and/or cleanup of PCBs at the Sunkist Site if new information shows that PCBs remain at the Site above the USEPA-approved PCB cleanup levels or if PCBs are found at other areas of the Sunkist Site.

USEPA is hereby approving the Application as modified by the conditions of approval established below. Sunkist and BEC must implement the Application as modified by these conditions.

In this approval, deadlines are based on a specific number of business days from the date of the approval.

- 1. Sunkist PCB Cleanup Site. The Sunkist PCB Cleanup Site (PCS) is located within the 11.11-acre Sunkist Site and encompasses all the areas of the Sunkist Site investigated for PCBs including and not limited to the former location of certain buildings already demolished and their associated basements as well as the location of buildings and related basements still to be demolished. The PCS also encompasses the areas where stockpiles of concrete derived from the demolition of Site buildings are located. Concrete in these stockpiles contain PCBs at various concentrations.
- 2. PCB cleanup level for soils and concrete. The approved PCB cleanup level for soils and concrete is 4.5 milligrams / kilogram (mg/kg). The PCB cleanup level discussed in the RAP (Application) is 6.5 mg/kg PCBs and this approval modifies the cleanup level in the RAP to 4.5 mg/kg. This approval is based on the health risk assessment conducted for the Sunkist Site as revised based on USEPA's comments on the risk assessment and guidance. The approved PCB cleanup is protective of the offsite residential, industrial, and construction worker exposure scenarios evaluated for receptors in proximity to the Site. The approved PCB cleanup level was developed taking into consideration analytical results for PCB Aroclor and dioxin-like PCB congeners.
- 3. Concrete stockpiles, statistical derivation of an additional number of concrete characterization samples. Within 5 days after the date of this approval, Sunkist / BEC must submit for USEPA approval the revised proposed number of additional concrete samples to be collected from each of several stockpiles (about 21) and building basements at the PCS. These stockpiles are listed in the attached table which is an excerpt from BEC's July 22, 2011 letter (Subject: Risk Assessment / RAP Review and Additional Action Items Former Sunkist Citrus Processing Plant. . .). Properly applied SW-846 statistical methodology shall be employed to calculate the number of additional concrete

¹ The attached electronic mail message from Dr. Patrick Wilson (USEPA R9) to Carmen Santos (USEPA R9), <u>Subject:</u> Former Sunkist Citrus Processing Plant Risk Assessment Review & PCB Remediation Goals briefly summarizes USEPA's risk assessment review. Also, refer to BEC's memo from Dr. Heriberto Robles to Brett Bowyer (BEC), <u>Subject:</u> Derivation of Risk-Based Cleanup Levels for PCBs in Crushed Concrete Addendum dated July 22, 2011 and included in BEC's July 22, 2011 letter to USEPA.

Date: August 19, 2011

samples. The approved cleanup level of 4.5 mg/kg PCBs shall be used as the regulatory threshold (RT) instead of the 1 mg/kg RT used in the calculations presented in BEC's July 22, 2011 letter. Based on the above, USEPA is requiring that Sunkist / BEC conduct the following steps:

- a. Sunkist / BEC must use the existing data and the current version of ProUCL to separately calculate the distribution-specific 95% upper confidence limit (UCL) on the mean concentration for each stockpile. Stockpiles with UCLs above 4.5 mg/kg PCBs shall be disposed offsite to prevent any exposures to PCBs contained in the concrete from these stockpiles in the future.
- b. For the stockpiles not identified for disposal in Condition C.3.a ("the remaining stockpiles"), the existing concrete stockpile data may be insufficient as to justify onsite use of the remaining concrete. Sunkist / BEC must conduct additional sampling of those stockpiles. The existing data for the remaining stockpiles shall be used to derive the number of additional concrete characterization samples needed for each of the remaining stockpiles using the statistical method specified in SW-846 and a regulatory threshold of 4.5 mg/kg and not of 1 mg/kg. A random sampling approach shall be used to collect the additional concrete samples needed from each remaining stockpile.
- c. Sunkist / BEC shall use the existing PCB characterization data for the remaining stockpiles together with the new data (required in Condition C.3.b) and the current version of ProUCL to calculate a separate UCL for each remaining stockpile. Sunkist / BEC must dispose offsite any stockpiles with a UCL above the 4.5 mg/kg PCB cleanup level (regulatory threshold).

Sunkist / BEC proposed in Section 3.1 (PCB Removals) of the RAP to remove for offsite disposal the crushed concrete in Basement 21, and in stockpiles W-N, D, 10, 16, 17, and 18 (including 18a and 18b). USEPA approves the offsite disposal of the concrete in Basement 21 and in the mentioned stockpiles in context to the approved PCB cleanup level of 4.5 mg/kg.

- 4. Basement 21 Removal Action (Section 4.2.1 of the RAP) and similar removal actions at other former Sunkist building basements. USEPA approves of the proposed remedial action as modified by this condition below and Condition C.3 above. USEPA is approving under 40 CFR 761.61(a) the soil sampling to be conducted in Basement 21 and any other basement from which crushed concrete will be removed.
 - a. Crushed concrete containing PCBs above the cleanup level has been placed in the basement of former Building 21. After the crushed concrete is removed from the basement, Sunkist / BEC proposes to collect composite soil samples following the procedures in 40 CFR 761.289(b)(1)(i). However, those sampling procedures do not apply. Instead, Sunkist / BEC shall collect the composite soil samples following the sampling approach in 40 CFR 761.289(b)(1)(ii), (b)(1)(ii)(A), (b)(1)(ii)(B), and (b)(1)(ii)(C) or equivalent method. Within 10 days after the date of this approval, Sunkist / BEC shall resubmit Figure 10 depicting the soil sampling locations in

the Building 21 basement and such locations shall be determined based on the sampling method in this regulation.

- 5. Stockpile Sampling and Off-Site Disposal (Section 4.2.2 of the RAP). Sampling of concrete from building basements and in above ground stockpiles must be conducted consistent with the method established in Condition C.3 above.
- 6. Basement 31 Porous Material Sampling (Section 4.2.3 of the RAP). USEPA approves of the sampling approach proposed for the concrete floor in Basement 31 provided the basement is not filled with bulk concrete (crushed or uncrushed). Soil samples shall be collected at concrete sampling locations where PCBs are equal to or higher than 4.5 mg/kg PCBs. One additional soil sample shall be collected in the lift L-42 area for a minimum of three soil samples to be collected from that area for PCB analysis. In addition, if the Basement 31 is filled with bulk concrete, the floor of this basement shall be sampled following the requirement in Condition C.4 above.
- 7. Soil beneath concrete stockpiles. Sunkist / BEC must sample surface soils (0 to 3 inches below ground surface) beneath all the concrete stockpiles to verify that PCBs are not present above the approved PCB cleanup level. Within 10 days after the date of this approval, Sunkist / BEC shall submit for review and approval the sampling approach to make this verification.
- 8. Decontamination of Movable Equipment, Tools, and Sampling Equipment Contaminated by PCBs. Equipment not covered in the USEPA Region 1 SOP must be decontaminated following the requirements in 40 CFR 761.79(c)(2).
- 9. Off-site disposal of decontamination residues, PCB remediation waste, and cleanup wastes. Decontamination residues and cleanup wastes must be disposed based on their original PCB concentration in accordance with 40 CFR 761.79(g)(2), (g)(6), and 40 CFR 761.61(a)(5), (a)(5)(i), (a)(5)(iii), and (a)(5)(v). Concrete and/or other porous surfaces(s) contaminated with PCBs above the PCB cleanup level to be approved must be disposed of as bulk PCB remediation waste in accordance with the requirements in 40 CFR 761.61(a)(5)(i)(B)(2)(ii), (a)(5)(v)(A), and (a)(5)(i)(B)(2)(iii). Disposal of all wastes (e.g., personal protective equipment, soils, concrete) generated during cleanup of PCBs must be in compliance with all applicable federal, state, and local regulations.
- 10. Dust management plan. Within 10 days after the date of this approval, BEC must submit a dust management plan that includes ambient air sampling and it is designed to be protective of workers and the public when conducting any activity at the Site that generates dust such as during crushing of PCB-contaminated concrete, demolition of above ground structures, and demolition of any remaining below ground structures at the Site. The dust management plan shall also be implemented during movement and removal of concrete from the concrete stockpiles and during movement of soils. As part of the dust management plan Sunkist / BEC shall propose a concentration (in mg / m³)

of dust that is protective of all receptors. Workers must be adequately protected to prevent exposure to PCBs.

11. Extraction and analytical methods. Field and laboratory quality control samples. Under the TSCA PCB regulations the applicant has the option to choose either the Soxhlet extraction method (USEPA Method 3540C) or the Ultrasonic method (USEPA Method 3550C). The Soxhlet extraction method is preferred by USEPA for both concrete and soil samples. If necessary, post extraction and pre-analysis sample cleanup (e.g., USEPA Methods 3665A [sulfuric acid], 3620C [florisil column], 3640A [Gel Permeation Column, GPC]) procedures must be considered if matrix interferences are suspected that could increase analytical method detection limits and compromise comparisons of analytical results to the cleanup levels required in this approval.

Within five (5) days after the date of this approval and before starting sampling at the PCS Sunkist / BEC shall submit a description of quality control (QC) procedures that will be implemented in the field during sample collection (characterization and cleanup verification sampling) and number and type of field QC (e.g., duplicates) samples to be collected for soil and concrete. This description shall also identify the laboratory QC samples (i.e., surrogate spikes, matrix spikes, equipment blanks) that will be prepared and analyzed by the contracted analytical laboratory together with the site samples.

12. Notification of PCB activity. Sunkist / BEC must comply with the notification and manifest requirements of 40 CFR 761, Subpart K when storing onsite, transporting, and disposing of PCBs offsite. Sunkist / BEC must comply with the requirements in 40 CFR 761.65(c)(1) and Sunkist / BEC's storage of PCB waste must not trigger the more stringent requirements in 40 CFR 761.65(b) and 761.65(c)(7) to be exempted from filing the Notification of PCB Activity as a generator of PCB waste.

The transporter of PCB remediation waste from the Sunkist Site must submit to USEPA Headquarters a Notification of PCB Activity Form before transporting the waste to the offsite disposal facility. Sunkist / BEC must dispose offsite all concrete that contains PCBs above the approved cleanup level without further delay. In accordance with 40 CFR 761.61(c), USEPA is extending the storage of PCB remediation waste at the site up to an additional 90 days beyond the 180 days established in 40 CFR 761.65(c)(9). Storage of waste containing PCBs above the cleanup level has already exceeded the 180 days established in 40 CFR 761.65(c)(9).

13. Demonstration of compliance with concrete and soil cleanup level. Sunkist / BEC will calculate the distribution-specific 95% confidence limit of the mean (i.e., the exposure-point concentration) of the analysis results for bulk concrete characterization samples, soil characterization samples, and soil cleanup verification samples separately using USEPA's ProUCL statistical program and compare that exposure point concentration (EPC) for soils and concrete to the cleanup level.

For concrete in stockpiles and / or placed in former building basements, Sunkist / BEC must refer to Condition C.3 above.

If the EPC for soils is higher than the cleanup level, Sunkist / BEC must conduct additional cleanup of soils and collect cleanup verification samples until the EPC calculated via ProUCL using this additional data is below the cleanup level. If the cleanup level is not achieved after further soil cleanup, Sunkist / BEC shall confer with USEPA as to the next steps that it will take to resolve the matter.

- 14. Areas investigated for non-PCB contamination (Section 4.3 [Non-TSCA Related Soil Removal Activities] of the RAP). Sunkist / BEC have indicated the source of PCBs at the Sunkist Site is unknown. Investigations for non-PCB contaminants have occurred in Area 24C, Area D-5-1, Area L-13-3, Area B-5-1, and Area D-1-1 (collectively referred to as "Non-PCB Areas") and petroleum hydrocarbons and polyaromatic hydrocarbons (PAHs) are present at some of these areas. Given Sunkist's uncertainty on the source of PCBs and the presence of PAHs and petroleum hydrocarbons, USEPA is requesting that cleanup verification sampling to be conducted in the "Non-PCB Areas" include testing for PCBs. Within 15 days after the date of this letter propose the number of soil samples that Sunkist / BEC will collect to demonstrate PCBs are not present in the "Non-PCB Areas" in concentrations above the USEPA-approved PCB cleanup level.
- 15. PCB Cleanup Completion Report. Within 60 days after Sunkist / BEC demonstrate that residual PCBs in soils are equal to or below the USEPA-approved PCB cleanup level, Sunkist / BEC must submit a PCB Cleanup Completion Report for USEPA approval (under 40 CFR 761.61(c)). This report must demonstrate compliance with all the conditions of approval and applicable TSCA PCB regulations in addition to applicable state and local regulations. Sunkist / BEC shall refer to 40 CFR 761.61(a)(9) and 761.125(c)(5) as a guideline to prepare the report and such guideline represents minimum requirements for the required PCB Cleanup Report. This report must provide all relevant sampling and analysis data and justifications demonstrating that Sunkist / BEC achieved the USEPA approved PCB cleanup level and that it met the conditions of approval.
- 16. Deed Restriction. Within 20 days after the date of this letter, confer with USEPA concerning the deed restriction that will be recorded for the property and in context to the PCB cleanup.



Former Sunkist Citrus Processing Plant Risk Assessment Review & PCB Remediation Goals

Patrick Wilson to: Carmen Santos

08/05/2011 06:00 PM

From:

Patrick Wilson/R9/USEPA/US

To:

Carmen Santos/R9/USEPA/US@EPA

Good Afternoon Carmen,

We have completed our review of the human health risk assessment reports and supplemental analyses submitted in support of remedial activities taken at the Former Sunkist Citrus Processing Facility in Ontario, Calif. As you know, this analysis was conducted by Bowyer Environmental Consulting for the property located at 616 Sunkist Street in Ontario. The objectives of the analysis were to assess the likelihood and magnitude of human health impacts from exposure to site-related contaminants. In addition, the risk analysis was designed to establish site-specific cleanup concentrations for impacted media which is considerate and protective of the receptor-specific exposure scenarios applied to this site.

This site is contaminated with a broad suite of environmental contaminants. U.S. EPA has retained direct authority over the assessment & cleanup of media impacted by polychlorinated biphenyls (PCBs). Media contaminated by other chemical constituents is regulated by the Hazardous Materials Division - Site Remediation/Local Oversight Program San Bernardino County Fire Department. This local agency receives technical risk assessment support from California-EPA's Office of Environmental Health Hazard Assessment (OEHHA).

As you know, the risk analysis in support of PCB impacted media has undergone several revisions. A number of these revisions have been a direct result of meetings, site visits and conference calls between representatives of Sunkist & EPA. For instance, EPA has recommended that Sunkist sample impacted media and subject it to analysis for the dioxin-like or coplanar PCB congener fraction in order to better characterize the full dimension of risk. As a result, a subset of PCB samples were analyzed not only based upon their aroclor composition, but also for their dioxin-like or coplanar congener content. In addition, EPA has recommended that the industrial worker exposure scenario remain considerate of the entire fraction of contaminated crushed concrete - rather than the 50% exposure fraction initially proposed. These examples are illustrative of specific procedural & methodological recommendations which ultimately resulted in a more conservative estimate of putative impacts and a more conservative cleanup goal.

Our review has found that the revised PCB cleanup concentration of 4.5 mg/kg for on-site soils and concrete is indeed, considerate & protective of the residential, industrial and construction worker exposure scenarios evaluated for receptors proximate to the site. We have independently confirmed the scenario-specific risk estimates for both the cancer endpoint and the non-cancer or systemically-toxic hazard characterization. We have found & confirmed that the carcinogenic risk from exposure to PCB impacted soils & concrete does not exceed Cal-EPA's Department of Toxic Substances Control (DTSC) risk management acceptability criteria for industrial sites of 1E-5. We have also confirmed that the non-cancer hazard from exposure to impacted media at the cleanup goal does not exceed the risk management acceptability criteria of unity (1).

Sunkist has conducted a number of removal operations at the site for impacted soils and concrete. The resulting exposure point concentration (EPC), or more accurately distribution-specific upper confidence limit on the mean (UCL), should therefore not exceed the proposed cleanup goal of 4.5 ppm total PCBs aroclors. It should be noted that this cleanup goal is germane to impacted media remaining on-site and protective of on-site workers consistent with a site-specific industrial exposure scenario(s). Off-site residents located directly adjacent to the former facility are also considered receptors subject to a number of complete exposure pathways. Potential impacts to this receptor group was assessed by application of an Agency-unapproved air dispersion model which estimated the fraction of contaminated dust impacting residential locations. We believe this model is inherently uncertain, has not been subject to Agency

approval or validation, yet is likely to overestimate the fraction of dust impacting residential receptors because of the stability class input applied, and because of the plume dispersion characteristics unique to this model. We strongly recommend that any and all future modelling efforts in this regard be conducted with the Agency's preferred and recommended air dispersion & deposition model, *AERMOD*.

Bowyer Environmental Consulting



August 31, 2011

VIA ELECTRONIC AND U.S. MAIL

Ms. Carmen Santos Waste Management Division U.S. Environmental Protection Agency Region 9 75 Hawthorne Street San Francisco, CA 94105

Subject:

Response to Conditional Requirements

Polychlorinated Biphenyls, Toxic Substances Control Act (40 CFR 761.61(c)) – USEPA Conditional Approval of "Remedial Action Plan"

Former Sunkist Citrus Processing Plant

616 E. Sunkist Street Ontario, California

Dear Ms. Santos:

Bowyer Environmental Consulting, Inc. (BEC) has prepared this response to the United States Environmental Protection Agency (EPA) conditional approval of the polychlorinated biphenyls (PCBs), Toxic Substances Control Act (40 CFR 761.61(c)) – "Remedial Action Plan" (Conditional Approval), which was provided by the EPA on August 19, 2011. The Conditional Approval was provided in response to the Remedial Action Plan (RAP) that BEC submitted to the EPA on, May 22, 2011, and additional information (Risk Assessment/RAP Review and Additional Action Items) that BEC provided to the EPA on July 22, 2011. The facility which is the subject of the RAP and Conditional Approval is the former Sunkist Citrus Processing Plant (Sunkist Site), located at 616 E. Sunkist Street in Ontario, California.

In order to facilitate the review of the additional information provided in this response, the specific conditions provided in the EPA conditional approval are listed, along with the associated responses, as follows.

1. Sunkist PCB Cleanup Site. The Sunkist PCB Cleanup Site (PCS) is located within the 11.11-acre Sunkist Site and encompasses all the areas of the Sunkist Site investigated for PCBs including and not limited to the former location of certain buildings already demolished and their associated basements as well as the location of buildings and related basements still to be demolished. The PCS also encompasses the areas where stockpiles of concrete derived from the demolition of Site buildings are located. Concrete in these stockpiles contain PCBs at various concentrations.

Agreed and noted.

2. **PCB** cleanup level for soils and concrete. The approved PCB cleanup level for soils and concrete is 4.5 milligrams/kilogram (mg/kg). The PCB cleanup level discussed in the RAP (Application) is 6.5 mg/kg PCBs and this approval modifies the cleanup level in the RAP to 4.5 mg/kg. This approval is based on the health risk assessment conducted for the Sunkist Site as revised based on USEPA's comments on the risk assessment and guidance. The approved PCB cleanup is protective of the offsite residential, industrial, and construction worker exposure scenarios evaluated for receptors in proximity to the Site. The approved PCB cleanup level was developed taking into consideration analytical results for PCB Aroclor and dioxin-like PCB congeners.

Agreed and noted.

3. Concrete stockpiles, statistical derivation of an additional number of concrete characterization samples. Within 5 days after the date of this approval, Sunkist/BEC must submit for USEPA approval the revised

¹ The attached electronic mail message from Dr. Patrick Wilson (USEPA R9) to Carmen Santos (USEPA R9), <u>Subject:</u> Former Sunkist Citrus Processing Plant Risk Assessment Review & PCB Remediation Goals briefly summarizes USEPA's risk assessment review. Also, refer to BEC's memo from Dr. Heriberto Robles to Brett Bowyer (BEC), <u>Subject:</u> Derivation of Risk-Based Cleanup Levels for PCBs in Crushed Concrete Addendum dated July 22, 2011 and included in BEC's July 22, 2011 letter to USEPA.

stockpiles with a UCL above the 4.5 mg/kg PCB cleanup level (regulatory threshold).

Sunkist/BEC proposed in Section 3.1 (PCB Removals) of the RAP to remove for offsite disposal the crushed concrete in Basement 21, and in stockpiles W-N, D, 10, 16, 17, and 18 (including 18a and 18b). USEPA approves the offsite disposal of the concrete in Basement 21 and in the mentioned stockpiles in context to the approved PCB cleanup level of 4.5 mg/kg.

Please note that, per the specified response schedule (" within 5 days after the date of the approval"), this response was provided previously via an email from Brett Bowyer of BEC to Carmen Santos and Steve Armann of the USEPA on August 25, 2011. Sunkist/BEC is in agreement with this comment and is providing the additional information and plans as part of this response. Please note that following the additional sampling of the crushed concrete stockpiles per the previously submitted plan (BEC, July 22, 2011), Sunkist made a decision to remove select stockpiles from the Site that we believed would not meet the revised cleanup criteria. The removed crushed concrete stockpiles included, Stockpiles 10, 14, 15, 16, 17 and W-N. In addition, the crushed concrete in Basement 21 is in the process of being removed from the Site. All of this material is being properly disposed of off-Site. Documentation regarding the disposed volumes and disposal facility information will be provided in the Completion Report. The approximate former location of these stockpiles, and of the remaining stockpiles and filled basements are shown on the attached Figure 1.

As per the requirements specified above, BEC performed additional statistical evaluations for the remaining twelve stockpiles of crushed concrete (Stockpiles 11, 12, 13, 18, 19, 20, 21, A, B, C, D and W-S) and two filled basements (Basement 11 and 64). This evaluation was performed per the methods specified in SW-846 (utilizing the 4.5 mg/kg cleanup value as the regulatory threshold, and the specific data previously

proposed number of additional concrete samples to be collected from each of several stockpiles (about 21) and building basements at the PCS. These stockpiles are listed in the attached table which is an excerpt from BEC's July 22, 2011 letter (Subject: Risk Assessment / RAP Review and Additional Action Items Former Sunkist Citrus Processing Plant...). Properly applied SW-846 statistical methodology shall be employed to calculate the number of additional concrete samples. The approved cleanup level of 4.5 mg/kg PCBs shall be used as the regulatory threshold (RT) instead of the 1 mg/kg RT used in the calculations presented in BEC's July 22, 2011 letter. Based on the above, USEPA is requiring that Sunkist/BEC conduct the following steps:

- a. Sunkist/BEC must use the existing data and the current version of ProUCL to separately calculate the distribution-specific 95% upper confidence limit (UCL) on the mean concentration for each stockpile. Stockpiles with UCLs above 4.5 mg/kg PCBs shall be disposed offsite to prevent any exposures to PCBs contained in the concrete from these stockpiles in the future.
- b. For the stockpiles not identified for disposal in Condition C.3.a ("the remaining stockpiles"), the existing concrete stockpile data may be insufficient as to justify onsite use of the remaining concrete. Sunkist/BEC must conduct additional sampling of those stockpiles. The existing data for the remaining stockpiles shall be used to derive the number of additional concrete characterization samples needed for each of the remaining stockpiles using the statistical method specified in SW-846 and a regulatory threshold of 4.5 mg/kg and not of 1 mg/kg. A random sampling approach shall be used to collect the additional concrete samples needed from each remaining stockpile.
- c. Sunkist/BEC shall use the existing PCB characterization data for the remaining stockpiles together with the new data (required in Condition C.3.b) and the current version of ProUCL to calculate a separate UCL for each remaining stockpile. Sunkist/BEC must dispose offsite any

collected from each stockpile and/or basement) to determine the appropriate number of additional samples necessary to complete the characterization of each of the stockpiles and/or basements. The evaluation is provided in Attachment A. As shown, the re-evaluation of the stockpiles specific data utilizing 4.5 mg/kg as the regulatory threshold found that sufficient data was available to characterize each of the stockpiles/basements except for Stockpile D. The SW-846 evaluation determined that thousands of samples would need to be collected from Stockpiles D in order to complete the characterization. In addition, based on the current dataset, the ProUCL calculation for Stockpile D is 6.35 mg/kg. Given these conditions, it has been decided that Stockpile D will be disposed of off-Site. Documentation regarding the final deposition of Stockpile D will be provided in the Completion Report.

An evaluation of the UCL for Stockpiles 11, 12, 13, 18, 19, 20, 21, A, B, C, and W-S, and for Basement 11 and 64 has been conducted, as provided in Attachment A. As shown the ProUCL estimate for each of these stockpiles and basements is less than the approved 4.5 mg/kg cleanup value. Based on the additional evaluations conducted here, Stockpiles 11, 12, 13, 18, 19, 20, 21, A, B, C and W-S will be utilized to fill low spots and as road base on the Site.

- 4. Basement 21 Removal Action (Section 4.2.1 of the RAP) and similar removal actions at other former Sunkist building basements. USEPA approves of the proposed remedial action as modified by this condition below and Condition C.3 above. USEPA is approving under 40 CFR 761.61 (a) the soil sampling to be conducted in Basement 21 and any other basement from which crushed concrete will be removed.
 - a) Crushed concrete containing PCBs above the cleanup level has been placed in the basement of former Building 21. After the crushed concrete is removed from the basement, Sunkist/BEC proposes to collect composite soil samples following the procedures in 40 CFR

761.289(b)(1)(i). However, those sampling procedures do not apply. Instead, Sunkist/BEC shall collect the composite soil samples following the sampling approach in 40 CFR 761.289(b)(1)(ii), (b)(1)(ii)(A), (b)(1)(ii)(B), and (b)(1)(ii)(C) or equivalent method. Within 10 days after the date of this approval, Sunkist/BEC shall resubmit Figure 10 depicting the soil sampling locations in the Building 21 basement and such locations shall be determined based on the sampling method in this regulation.

As per our discussion on August 24, 2011, it was agreed that despite the fact that the presence of the crushed concrete in Basement 21 met the regulatory description provided in 40 CFR 761.289(b)(1)(ii), (b)(1)(ii)(A), (b)(1)(ii)(B), and (b)(1)(ii)(C), the data generated by collecting composite soil samples following the procedures in 40 CFR 761.289(b)(1)(i) would be more practical in this case. As a result, it is our understanding that the approach presented in the RAP is to be approved, and there is no need to provide a revised version of Figure 10.

5. Stockpile Sampling and Off-Site Disposal (Section 4.2.2 of the RAP).

Sampling of concrete from building basements and in above ground stockpiles must be conducted consistent with the method established in Condition C.3 above.

Agreed and Noted. The stockpiles generated through the demolition of Buildings 12 and 15 will be crushed and sampled on a random basis. The appropriate number of samples will be defined based on SW-846 methodology and the UCL will be determined based on the data set. The UCL will be compared to the cleanup value (4.5 mg/kg). If the UCL is less than the 4.5 mg/kg than it will be utilized on-Site as fill and/or road base. If the UCL is greater than 4.5 mg/kg it will be properly disposed of off-Site.

6. Basement 31 Porous Material Sampling (Section 4.2.3 of the RAP). USEPA approves of the sampling approach proposed for the concrete floor in Basement 31 provided the basement is not filled with bulk concrete (crushed or uncrushed). Soil samples shall be collected at concrete sampling locations where PCBs are equal to or higher than 4.5 mg/kg PCBs. One additional soil sample shall be collected in the lift L-42 area for a minimum of three soil samples to be collected from that area for PCB analysis. In addition, if the Basement 31 is filled with bulk concrete, the floor of this basement shall be sampled following the requirement in Condition C.4 above.

The additional sample will be collected at L-42. However, as the City (property buyer) does not want this concrete feature to remain at the current depth, the basement floor at Building 31 will be removed during demolition. As it is no longer planned to leave the basement in place, the sampling approach proposed in the RAP is no longer applicable. It is now planned that this concrete will be removed and crushed along with the rest of Building 31. The stockpiles generated through the demolition of Buildings 31 (including the basement) will be crushed and sampled on a random basis. The appropriate number of samples will be defined based on SW-846 methodology and the UCL will be determined based on the data set. The UCL will be compared to the cleanup value (4.5 mg/kg). If the UCL is less than the 4.5 mg/kg than it will be utilized on-Site as fill and/or road base. If the UCL is greater than 4.5 mg/kg it will be properly disposed of off-Site. It should be noted that the only material that will be utilized for fill and/or road base will be analyzed by the above-described approved methods involving the comparison of the UCL to the cleanup criteria. Material that does not exhibit an UCL of less than 4.5 mg/kg will not be utilized (at Basement 31 or anywhere else on the Site) as fill, or for any other purpose. As a result, only Basement 21, or soil under former stockpiles that exhibited PCB concentrations of greater than 4.5 mg/kg (See Comment No. 7), will need to be sampled to confirm that the unacceptable material has been removed. As such, no additional sampling of the subsurface after the removal of the concrete floor from Basement 31 is necessary (other than at the lifts).

Any additional concrete at the Site generated during the additional demolition will be evaluated by the approved procedures to determine if it can be reused as fill and/or road base, or needs to be disposed off-Site (UCL of greater than 4.5 mg/kg). For instance, the foundation of the Wastewater Treatment Plant (WWTP) has been sampled as presented in the Porous Media Sampling and Removal Action Plan - Wastewater Treatment Plant (BEC, August 29, 2011). As described in this document, areas that exhibited PCB concentrations of greater than 4.5 mg/kg are to be cut out and properly disposed of off-Site. The remaining foundation material will be crushed, and an appropriate number of random samples (per SW-846) will be collected and statistically evaluated to determine the UCL. If the UCL for this material is less than the cleanup criteria (4.5 mg/kg) than the material will be reused at the Site a fill and/or road base. If the material has an UCL of greater than 4.5 mg/kg it will be properly disposed of off-Site.

7. Soil beneath concrete stockpiles. Sunkist/BEC must sample surface soils (0 to 3 inches below ground surface) beneath all the concrete stockpiles to verify that PCBs are not present above the approved PCB cleanup level. Within 10 days after the date of this approval, Sunkist/BEC shall submit for review and approval the sampling approach to make this verification.

Agreed and Noted. This requirement applies to stockpiles that contained PCB concentrations of greater than 4.5 mg/kg. As such, soil samples will be collected at 0-3 inches below ground surface under and near Stockpiles W-N, W-S, A, C, D, 10, 13, 14, 15, 16, 17 and 18. Samples will not be collected from Stockpiles B, 11, 12, 19, 20 and 21 as discrete samples of greater than 4.5 mg/kg were not observed in these stockpiles. The sampling areas with respect to the Stockpiles, and Site in general, are shown on Figure 1. Specific plans for the sample collection are shown on Figures 2 through 4. As shown, the total area associated with this sampling program is over 1.2 acres in size. As such, the compositing areas have been modified to include up to 36 discrete samples per area for the larger areas. In total, the planned program involves the analysis of 43 composited samples. Each of these samples will be analyzed for PCBs by the methods specified in Comment No. 11.

8. **Decontamination of Movable Equipment, Tools, and Sampling Equipment Contaminated by PCBs.** Equipment not covered in the USEPA Region I SOP must be decontaminated following the requirements in 40 CFR 761.79(c)(2).

Agreed and Noted.

9. Off-site disposal of decontamination residues, PCB remediation waste, and cleanup wastes. Decontamination residues and cleanup wastes must be disposed based on their original PCB concentration in accordance with 40 CFR 761.79(g)(2), (g)(6), and 40 CFR 761.61(a)(5), (a)(5)(i), (a)(5)(iii), and (a)(5)(v). Concrete and/or other porous surfaces(s) contaminated with PCBs above the PCB cleanup level to be approved must be disposed of as bulk PCB remediation waste in accordance with the requirements in 40 CFR 761.61(a)(5)(i)(B)(2)(ii), (a)(5)(v)(A), and (a)(5)(i)(B)(2)(iii). Disposal of all wastes (e.g., personal protective equipment, soils, concrete) generated during cleanup of PCBs must be in compliance with all applicable federal, state, and local regulations.

Agreed and Noted.

10. Dust management plan. Within 10 days after the date of this approval, BEC must submit a dust management plan that includes ambient air sampling and it is designed to be protective of workers and the public when conducting any activity at the Site that generates dust such as during crushing of PCB-contaminated concrete, demolition of above ground structures, and demolition of any remaining below ground structures at the Site. The dust management plan shall also be implemented during movement and removal of concrete from the concrete stockpiles and during movement of soils. As part of the dust management plan Sunkist/BEC shall propose a concentration (in mg/m3) of dust that is protective of all receptors. Workers must be adequately protected to prevent exposure to PCBs.

A previous plan associated with the management of dust at the Site was sent to you via email on June 27, 2011. This plan has been augmented to

include a target level and confirmation monitoring based on all exposure pathways. A copy of this plan is provided in Attachment B.

11. Extraction and analytical methods. Field and laboratory quality control samples. Under the TSCA PCB regulations the applicant has the option to choose either the Soxhlet extraction method (USEPA Method 3540C) or the Ultrasonic method (USEPA Method 3550C). The Soxhlet extraction method is preferred by USEPA or both concrete and soil samples. If necessary, post extraction and pre-analysis sample cleanup (e.g., USEPA Methods 3665A [sulfuric acid], 3620C [florisil column], 3640A [Gel Permeation Column, GPC]) procedures must be considered if matrix interferences are suspected that could increase analytical method detection limits and compromise comparisons of analytical results to the cleanup levels required in this approval.

Within five (5) days after the date of this approval and before starting sampling at the PCS Sunkist/BEC shall submit a description of quality control (QC) procedures that will be implemented in the field during sample collection (characterization and cleanup verification sampling) and number and type of field QC (e.g., duplicates) samples to be collected for soil and concrete. This description shall also identify the laboratory QC samples (i.e., surrogate spikes, matrix spikes, equipment blanks) that will be prepared and analyzed by the contracted analytical laboratory together with the site samples.

Please note that, per the specified response schedule ("within 5 days after the date of the approval"), this response was provided previously via an email from Brett Bowyer of BEC to Carmen Santos and Steve Armann of the USEPA on August 25, 2011. Agreed and Noted. As specified in the Sampling and Analysis Plan (SAP) that was submitted (Appendix D) as part of the RAP (BEC, May 22, 2011) the following QA/QC samples will be collected:

 Field Duplicates - Field duplicate samples will be collected at a minimum frequency of 1 for every 20 samples collected. Duplicate samples will be independently collected as close as possible to the

- original sample from the same source under identical sampling conditions. The field duplicate samples will be uses to document sampling and analytical precision.
- Equipment Rinsate Blanks Equipment rinseate blanks will be collected to evaluate field sampling and decontamination procedures by pouring water (for soil and stockpile sampling) or hexane (for porous material sampling) over the decontaminated equipment, following sample collection. In general, equipment blanks will be collected at a rate of 1 in 20 (minimum of one per day).
- Matrix Spike and Matrix Spike Duplicate (MS/MSD) In general, for every 20 field samples, one location will have sample volume collected in triplicate and will be designated on the chain-ofcustody form as an MS/MSD.
- Surrogate Analysis ABC will analyze surrogates with each of the analyses performed. For the 8082 analysis, the laboratory utilizes 2,4,5,6-tetrachloro-m-xylene and decachlorobihenyl as surrogates. The recoveries of these compounds will be reported on the laboratory reports.
- **12. Notification of PCB activity.** Sunkist/BEC must comply with the notification and manifest requirements of 40 CFR 761, Subpart K when storing onsite, transporting, and disposing of PCBs offsite. Sunkist/BEC must comply with the requirements in 40 CFR 761.65(c)(1) and Sunkist/BEC's storage of PCB waste must not trigger the more stringent requirements in 40 CFR 761.65(b) and 761.65(c)(7) to be exempted from filing the Notification of PCB Activity as a generator of PCB waste.

The transporter of PCB remediation waste from the Sunkist Site must submit to USEPA Headquarters a Notification of PCB Activity Form before transporting the waste to the offsite disposal facility. Sunkist/BEC must dispose offsite all concrete that contains PCBs above the approved cleanup level without further delay. In accordance with 40 CFR 761.61(c), USEPA is extending the storage of PCB remediation waste at the site up to an additional 90 days beyond the 180 days

established in 40 CFR 761.65(c)(9). Storage of waste containing PCBs above the cleanup level has already exceeded the 180 days established in 40 CFR 761.65(c)(9).

Per previous direction from the EPA, a PCB Activity Notification was previously sent to EPA Headquarters. A copy of the previous notification and proof of delivery on August 2, 2011 is provided as Attachment C. We are assuming that the attached notification fulfills the requirement stated in the conditions. Please confirm and/or let us know if you require additional specific notifications to be made by the transporter. Also, we understand that all PCB material above the cleanup criteria (4.5 mg/kg) needs to be disposed of off Site prior to February 19, 2012.

13. Demonstration of compliance with concrete and soil cleanup level. Sunkist / BEC will calculate the distribution-specific 95% confidence limit of the mean (i.e., the exposure-point concentration) of the analysis results for bulk concrete characterization samples, soil characterization samples, and soil cleanup verification samples separately using USEPA's ProUCL statistical program and compare that exposure point concentration (EPC) for soils and concrete to the cleanup level.

For concrete in stockpiles and / or placed in former building basements, Sunkist/BEC must refer to Condition C.3 above.

If the EPC for soils is higher than the cleanup level, Sunkist/BEC must conduct additional cleanup of soils and collect cleanup verification samples until the EPC calculated via ProUCL using this additional data is below the cleanup level. If the cleanup level is not achieved after further soil cleanup, Sunkist/BEC shall confer with USEPA as to the next steps that it will take to resolve the matter.

Please note that, per the specified response schedule (" within 5 days after the date of the approval"), this response was provided previously via an email from Brett Bowyer of BEC to Carmen Santos and Steve Armann of the USEPA on August 25, 2011. Agreed and Noted. As stated in the response to No. 3, the EPC's for crushed concrete in stockpiles and

basements that are less than the cleanup level (4.5 mg/kg) are provided in Attachment A. Additional evaluations will be made upon the collection of representative soil and/or crushed concrete samples as discussed in preceding sections of this letter. The results of these additional analyses and the calculation of EPCs will be provided in the Completion Report.

14. Areas investigated for non-PCB contamination (Section 4.3 [Non-TSCA Related Soil Removal Activities] of the RAP). Sunkist/BEC have indicated the source of PCBs at the Sunkist Site is unknown. Investigations for non-PCB contaminants have occurred in Area 24C, Area D-5-1, Area L-13-3, Area B-5-1, and Area D-1-1 (collectively referred to as "Non-PCB Areas") and petroleum hydrocarbons and polyaromatic hydrocarbons (PAHs) are present at some of these areas. Given Sunkist's uncertainty on the source of PCBs and the presence of PAHs and petroleum hydrocarbons, USEPA is requesting that cleanup verification sampling to be conducted in the "Non-PCB Areas" include testing for PCBs. Within 15 days after the date of this letter propose the number of soil samples that Sunkist/BEC will collect to demonstrate PCBs are not present in the "Non-PCB Areas" in concentrations above the USEPA-approved PCB cleanup level.

Please note that, this response was provided previously via an email from Brett Bowyer of BEC to Carmen Santos and Steve Armann of the USEPA on August 25, 2011. The non-PCB areas were relatively small and all but one of these areas (24C) had one or two previous samples collected and analyzed for PCBs. The results of the previous analyses, along with plans for additional sample collection and analysis are provided on the attached Figures 5 through 9. Please concur or provide comment on these proposed plans as soon as possible, as the proposed sampling has already been implemented in order to meet the critical project schedule.

15. **PCB Cleanup Completion Report.** Within 60 days after Sunkist/BEC demonstrate that residual PCBs in soils are equal to or below the USEPA-approved PCB cleanup level, Sunkist/BEC must submit a PCB Cleanup

Completion Report for USEPA approval (under 40 CFR 761.61(c)). This report must demonstrate compliance with all the conditions of approval and applicable TSCA PCB regulations in addition to applicable state and local regulations. Sunkist/BEC shall refer to 40 CFR 761.61 (a)(9) and 761.125(c)(5) as a guideline to prepare the report and such guideline represents minimum requirements for the required PCB Cleanup Report. This report must provide all relevant sampling and analysis data and justifications demonstrating that Sunkist/BEC achieved the USEPA approved PCB cleanup level and that it met the conditions of approval.

Agreed and Noted.

16. **Deed Restriction.** Within 20 days after the date of this letter, confer with USEPA concerning the deed restriction that will be recorded for the property and in context to the PCB cleanup.

Agreed and Noted.

As we have relayed previously, there is a need to meet critical schedule conditions associated with this project. As such, we would appreciate your concurrence to these responses as soon as possible. If there is a need to confer regarding these responses, please contact us at 877-232-4620 at your earliest possible convenience.

Sincerely,

Heriberto Robles, Ph.D., D.A.B.T.

Senior Technical Consultant

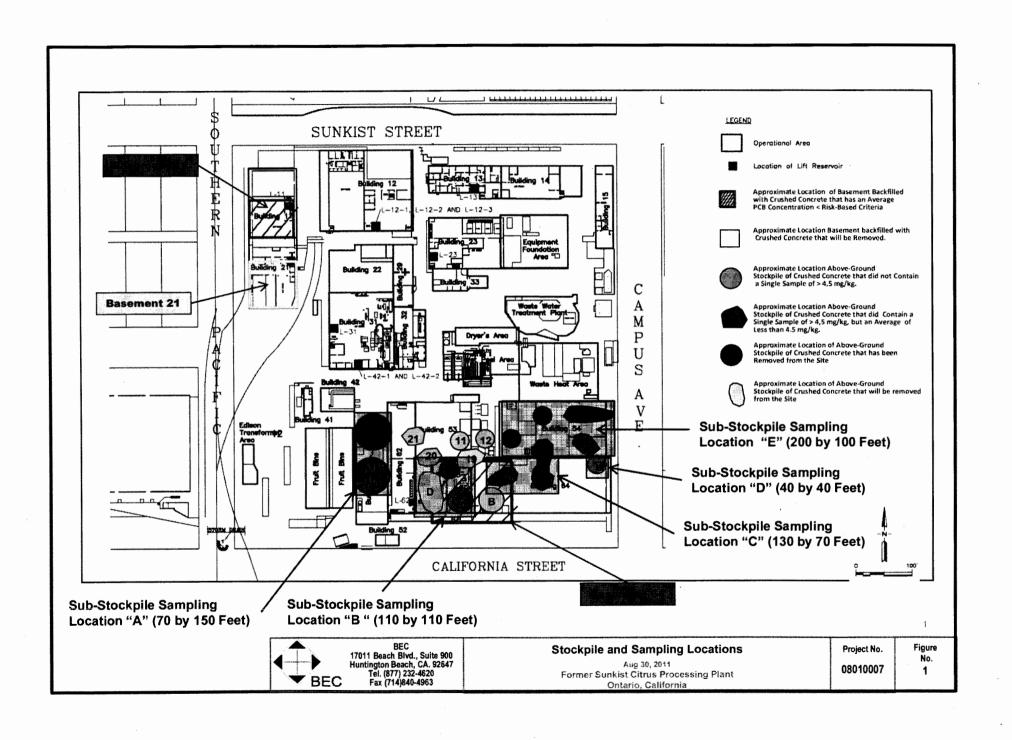
Bowyer Environmental Consulting, Inc.

Brett H. Bowyer, P.G.

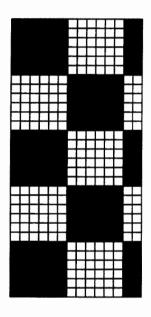
Principal

Bowyer Environmental Consulting, Inc.

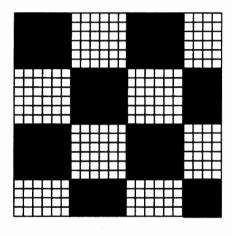
Figures



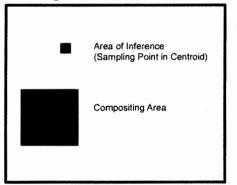
Sampling Area A



Sampling Area B



Legend



Approximate Scale

In Feet





BEC 17011 Beach Blvd., Suite 900 Huntington Beach, CA. 92647 Tel. (877) 232-4620 Fax (714)840-4963

Sub-Stockpile Sampling Locations A and B

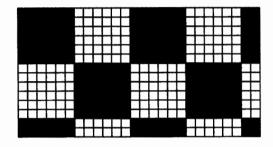
Aug 30, 2011 Former Sunkist Citrus Processing Plant Ontario, California

Project No.

Figure No. 2

08010007

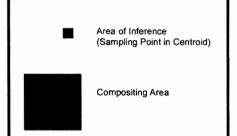
Sampling Area C



Sampling Area D



Legend



1

Approximate Scale

In Feet



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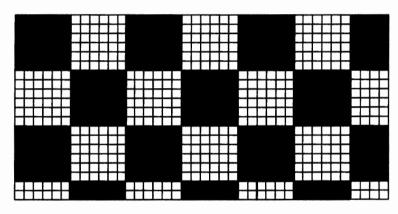
Sub-Stockpile Sampling Locations C and D

Aug 30, 2011 Former Sunkist Citrus Processing Plant Ontario, California Project No.

Figure No. 3

08010007

Sampling Area E



Legend





Compositing Area

Approximate Scale

In Feet





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Sub-Stockpile Sampling Location E

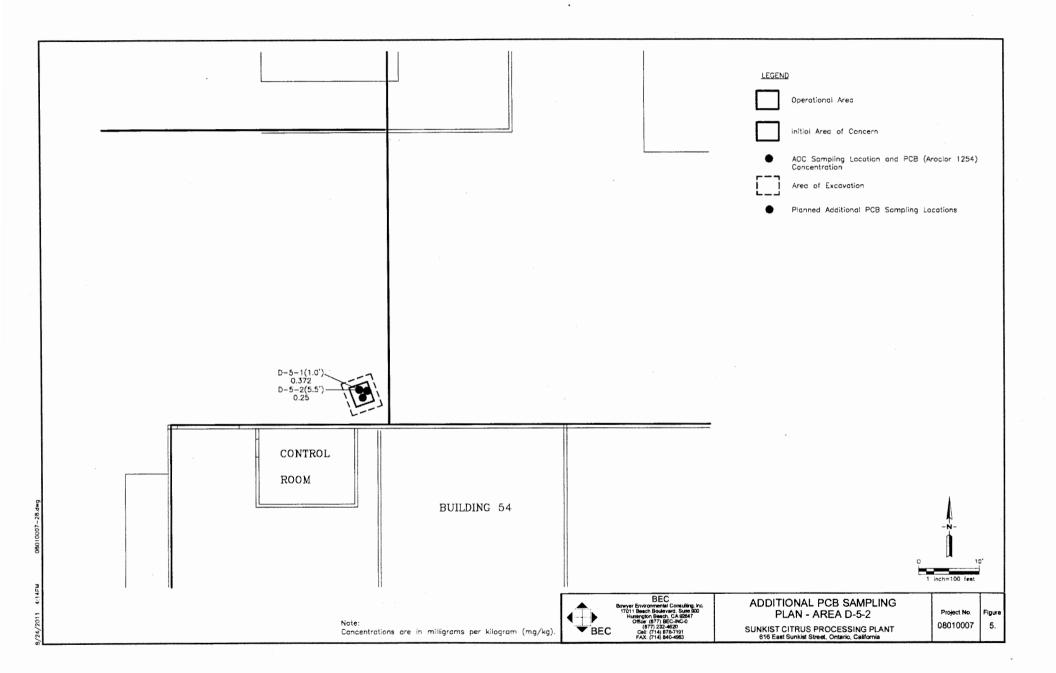
Aug 30, 2011

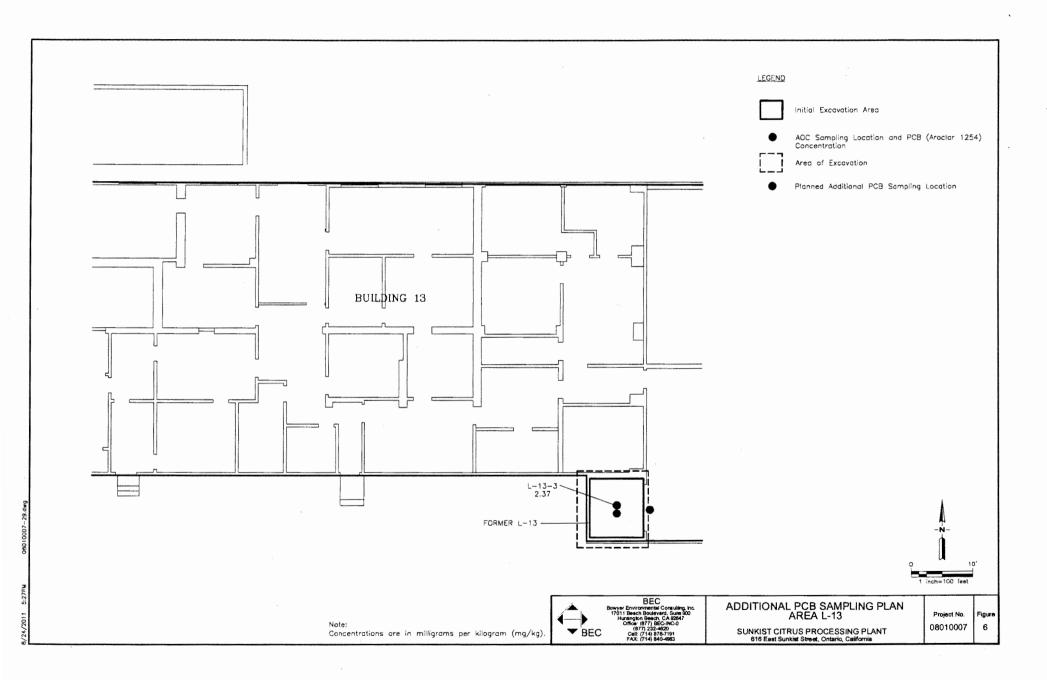
Former Sunkist Citrus Processing Plant Ontario, California

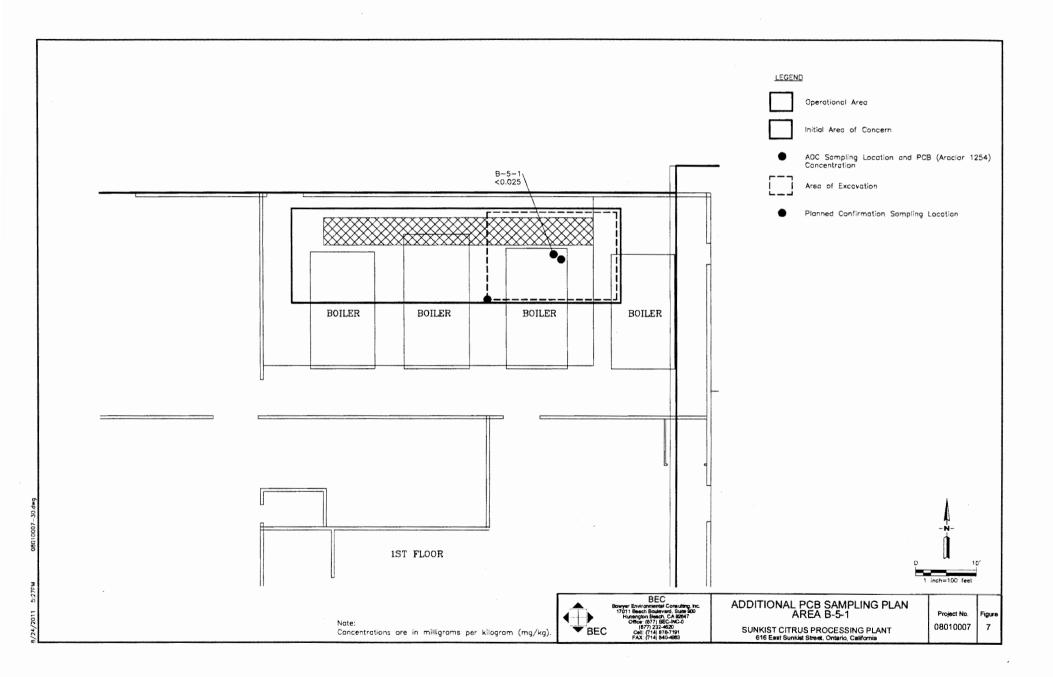
Project No.

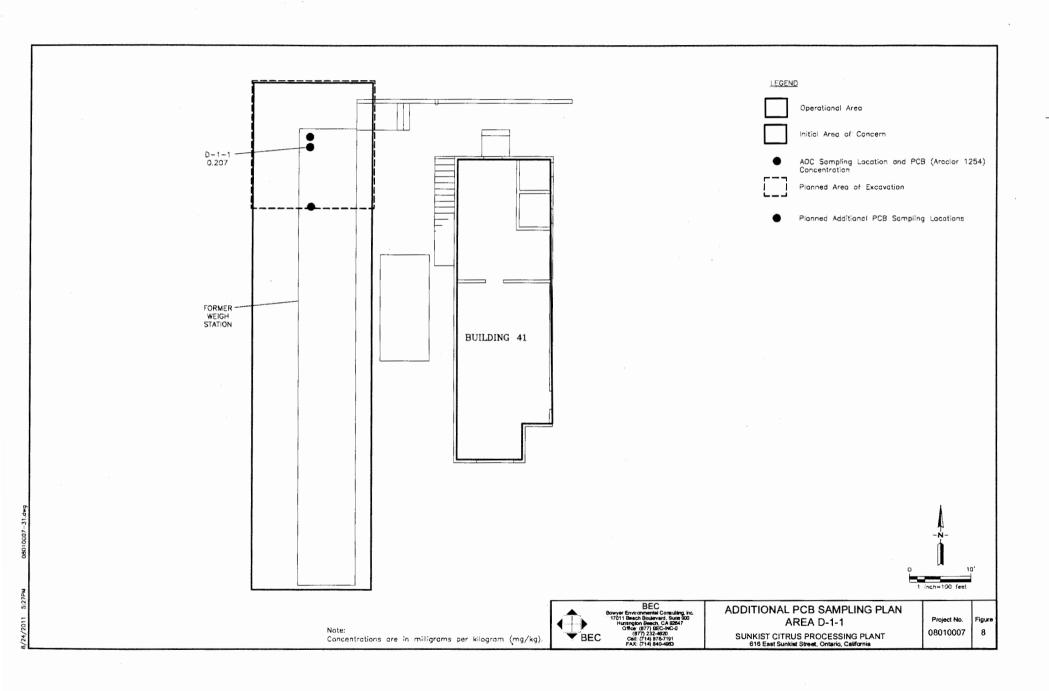
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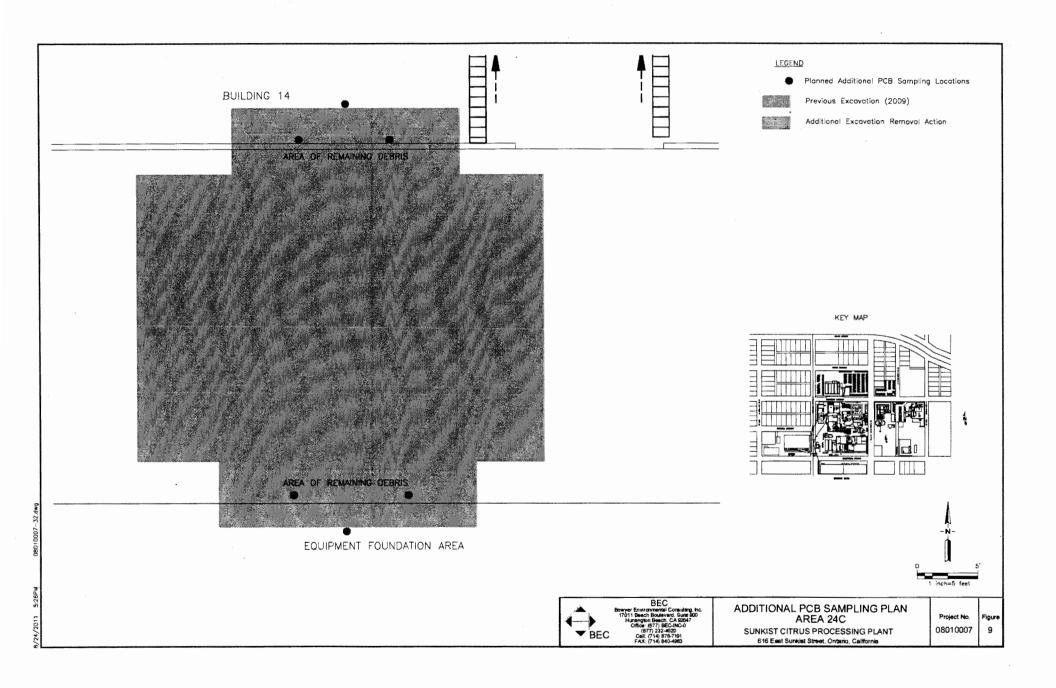
Figure No.











Attachment A

Statistical (ProUCL) Evaluation of Crushed Concrete

Statistical Evaluation

	Basement 11	Basement 64	Western - South	Eastern D	Eastern B	Eastern A	Eastern C	Eastern Pile 11	Eastern Pile 12	Eastern Pile 13	Eastern Pile 18	Eastern Pile 19	Eastern Pile 20	Eastern Pile 21
	Total PCBs	Total PCBs	Total PCBs	Total PCBs	Total PCBs	Total PCBs	Total PCBs	Total PCBs	Total PCBs	Total PCBs	Total PCBs	Total PCBs	Total PCBs	Total PCBs
	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)
	2	0.122	0.279	8.050	1.980	0.738	2.980	0.258	0.447	5.330	5.030	0.332	0.444	0.274
	1.33	2.59	0.321	5.990	1.890	1.720	3.200	0.770	0.261	1.860	0.439	0.775	0.154	1.140
	0.992	0.822	0.642	6.420	1.560	1.080	3,130	0.209	0.272	3.930	1.110	0.156	0.158	0.710
	3.67	1.01	2.200	2.690	0.847	5.610	3.140	0.416	0.121	1.680	0.372	0.416	1.340	0.705
	2.51	0.42	1.900	2.090	1.440	1.360	1.670	0.227	0.296	0.820	0.310	1.520	0.695	0.510
Data	5.41	0.68	4.630 1.090	0.955 2.600	1.540 2.400	2.810 1.840	5.140 1.910	0.640 0.0928	0.795 0.482	0.636 4.860	0.635 0.511	0.290	0.214 0.098	0.327
Data		0.879 1.04	1.090	2.510	2.330	1.540	1.850	0.0928	U.4D.2	4.000	0.324		0.098	0.471
		0.175	1.440	9.280	1.240		1.650				0.313			
		ND<0.025		9.200	1.240						0.839			
		3.02									0.339			
		2.25									0.828			
		4.79									0.313			
		4.77									0.515			
Statistial Parameters														
Number of Samples (n)	6	13	8	9	9	7	8	7	7	7	13	6	7	7
Degrees of Freedom (df, n-l)	5	12	7	8	8	6	7	6	6	6	12	5	6	6
Student t value (t)	1.476	1.356	1.415	1.397	1.397	1.44	1.415	1.44	1.44	1.44	1.356	1.476	1.44	1.44
Sample Mean Concentration	2.65	1.37	1.56	4.51	1.69	2.17	2.88	0.37	0.38	2.73	0.87	0.58	0.44	0.59
Sample Standard Deviation (s)	1.65	1.40	1.42	2.97	0.51	1.66	1.12	0.25	0.22	1.94	1.27	0.50	0.45	0.29
Variance (s^2)	2.72	1.97	2.03	8.82	0.26	2.74	1.26	0.06	0.05	3.77	1.62	0.25	0.20	0.09
Delta	1.85	3.13	2.94	-0.01	2.81	2.33	1.62	4.13	4.12	1.77	3.63	3.92	4.06	3.91
Appropriate Number of Samples to Collect from Waste	1.73	0.37	0.47	193027.36	0,06	1.04	0.96	0.01	0.01	2.50	0.23	0.04	0.03	0.01
Additional Samples to Collect	None	None	None	193018	None	None	None	None	None	None	None	None	None	None
95% Upper Confidence Limit	4.01	3.07	2.52	6.35	2.01	3.84	3.63	0.56	0.54	4.16	2.42	1.00	0.99	0.81
Stockpile Needs to Be Sampled and/or Removed?	No	No	No	Yes	No	No	No	No	No	No	No	No	No	No

Regulatory Threshold (mg/kg)

4.5

Attachment B

Dust Management Plan

Ambient air will be monitored for the presence of dust throughout active demolition and/or grading operations. Activities monitored will include, but not be limited to crushing of concrete, demolition of above and/or below ground structures, movement of materials, and grading.

The dust measurements will be collected during these activities using a Thermo MIE pDR-1000 DataRam. Measurements will be collected downwind, upwind and within working zones. At a minimum, one measurement will be collected every 15 minutes during ongoing operations. Additional dust measurements will also be obtained along the western fence line to evaluate the potential for dust to migrate off-Site to the nearby residential properties.

The following sections describe the method utilized to derive action levels associated with the dust monitoring program and mitigation measures that will be taken to limit the amount of dust generated.

Dust Action Level Calculation for the Protection of Onsite Workers

Aroclor 1254 been detected in crushed concrete and soil at the Site. The NIOSH Recommended Exposure Limit (REL) for Aroclor 1254 is 0.001 milligrams per cubic meter (mg/m³). The REL is a time-weighted average (TWA) concentrations for up to a 10-hour workday during a 40-hour workweek, above which inhalation is considered by NIOSH to be a concern. Data collected from soil and crushed concrete samples has detected Aroclor 1254 at up to 27 mg/kg. By conservatively assuming that all dust generated at the Site has an Aroclor 1254 concentration of 27 milligrams per kilogram (mg/kg), the amount of dust in air required to hold no more than 0.001 mg of Aroclor 1254 has been calculated (37.0 milligrams). As such, the conservative dust action level for the protection of onsite workers has been calculated at 37.0 mg/m³. As this number is likely to allow for the presence of significant visible dust, an even more conservative action level of 12 mg/m³ has been established for all work zones at the Site.

Dust Action Level Calculation for the Protection of Offsite Residents

A conservative evaluation of the action level for off-Site dust to residences

was calculated based on the most elevated concentration of PCBs in crushed concrete, and the concentration in air that is protective of residential receptors per the EPA Regional Screening Levels (RSLs) table. According to the RSL table, an Aroclor 1254 concentration in air equal to 4.3E-03 ug/m³ is protective of residential receptors. Data collected from crushed concrete samples has detected Aroclor 1254 at up to 27 mg/kg (please note that the limited area of uncrushed concrete on the WWTP that contained up to 66.6 mg/kg of Aroclor 1260 will not be crushed and it is not likely that a significant amount of dust will be generated during the removal of this material). Assuming all dust generated at the Site had an Aroclor 1254 concentration of 27 mg/kg, the amount of dust in air required to hold no more than 4.3E-03 micrograms of Aroclor 1254 is 0.159 milligrams. Thus, the conservative dust action level for the protection of off-Site residential receptors is 0.159 mg/m³.

Mitigation Measures

At any time during these monitoring activities bulk dust concentrations in excess of 12 mg/m³ are measured, work will be halted and additional dust suppression activities will be implemented until the conditions are abated. In addition, if at any time bulk dust concentrations in excess 0.159 mg/m³ are observed along the western fence line due to on-Site activities, work will be halted and additional dust suppression activities will be implemented. These additional dust suppression activities will involve the application of additional water or dust suppression agent such as SoilTac tm or Gorilla Snottm, if necessary.

Attachment C

PCB Activity Notification and Proof of Delivery

USEPA

United States **Environmental Protection Agency** Washington, DC 20460

Form Approved OMB No. 2070-0112

No	tification of	PCB A	ctivity			
Return To:	in designation of the second o	All the section of th	For Official Use O	nly		
Document Control Offic Office of Solid Waste U.S. Environmental Prot 1200 Pennsylvania Ave. Washington, DC 20460	ection Agency N.W.					
Name of Facility Former Ontario Citrus Processing Plant	Name of Owner Facility Sunkist Growers, Inc.		2. EPA Identification CAD981412828	1 Number (if already assigned under RCRA)		
3. Facility Mailing Address (Street or PO B	ox, City, State, & Zip Code)	4. Location of Facili	ty (No. Street, City, S	State, & Zip Code)		
616 East Sunkist S Ontario, Californi		616 East Sunkist Street Ontario, California 91761				
5. Installation Contact (Name and Title) Keith Rudd				propriate box. See Instructions. B. Storer (Commercial)		
Director of Environ	mental	X A. Generator w/onsite storage facility B. Storer (Commercial) C. Transporter D. R&D/Treatability E. Approved Disposer F. Scrap Metal Recovery Oven/Smell High Efficiency Boilers				
Telephone Number (Area Code and Number 559 - 684 - 3673	er)					
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accompanying this document document for which I cannot supervisory responsibility for that this information is true, a	is true, accurate, and opersonally verify truth the persons who, action courate, and complete	complete. As to and accuracy, land under my dir	the identified so certify as a con ect instructions,	ection(s) of this npany official having made the verification		
Signature	Keith	cial Title (Type of Pi Rudd or of Envil		7-26-//		
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Additional Sampling at Non -PCB Area and WWTP

Brett Bowyer to: Carmen Santos

Cc: Steve Armann, "Keith Rudd"

1 attachment



090111_Additonal Sampling [Compatibility Mode].pdf

Hello Carmen,

Per our conversation this morning/afternoon, please find attached the following three figures:

- Figure 1 Area B-5-1 Six additional soil samples analyzed for PCBs by the previously specified methods;
- Figure 2 Area D-1-1 Ten additional soil samples analyzed for PCBs by the previously specified methods;
- Figure 3 WWTP = Fifteen additional porous media (concrete and or joint grout) analyzed for PCBs by the previously specified methods.

Please see the attached from ABC verifying that they followed the requirements specified in the August 19, 2011 RAP approval. I may be providing you with additional info tomorrow to help clarify the question you had regarding the WWTP report.

In the meantime, could you please confirm that the above-stated soil and concrete sampling plans are consistant with what we discussed and meet your requirements.

Thank you.

Brett Bowyer, P.G.
Bowyer Environmental Consulting, Inc.
17011 Beach Boulevard, Suite 900
Huntington Beach, CA 92647
Office: (877) 232-4620

Cell: (714) 878-7191 FAX: (714) 840-4963

www.bowyerenvironmental.com

----- Message from "abcelab@verizon,net" <abcelab@verizon.net> on Wed, 24 Aug 2011 12:42:33 -0700

To: "Brett Bowyer"
 subject: Re: Sunkist Ontario
 Hi Brett,

We followed those requirements.

Jenny

09/01/2011 05:06 PM

---- Original Message -----

From: Brett Bowyer <mailto:brettbowyer@bowyerenvironmental.com>

To: abcelab@verizon.net

Cc: Keith Rudd <mailto:krudd@sunkistgrowers.com>

Sent: Wednesday, August 24, 2011 12:33 PM

Subject: Sunkist Ontario

Hi Jenny,

Please see the following requirements that were specifically stated in the EPA approval of the RAP for Sunkist Ontario,. Please confirm that you are following these specific requirements. If not, please let me know right away, as we need to respond to the EPA by tomorrow.

Thanks.

Under the TSCA PCB regulations the applicant has the option to choose either the Soxhlet extraction method (USEPA Method 3540C) or the Ultrasonic method (USEPA Method 3550C). The Soxhlet extraction method is preferred by USEPA or both concrete and soil samples. If necessary, post extraction and pre-analysis sample cleanup (e.g., USEPA Methods 3665A [sulfuric acid], 3620C [florisil column], 3640A [Gel Permeation Column, GPC]) procedures must be considered if matrix interferences are suspected that could increase analytical method detection limits and compromise comparisons of analytical results to the cleanup levels required in this approval.

Brett Bowyer, P.G.

Bowyer Environmental Consulting, Inc.

17011 Beach Boulevard, Suite 900

Huntington Beach, CA 92647

Office: (877) 232-4620

Cell: (714) 878-7191

FAX: (714) 840-4963

http://www.bowyerenvironmental.com/ www.bowyerenvironmental.com



Fw: Sunkist Ontario Carmen Santos to: John Beach

08/24/2011 12:54 PM

Hello John:

Brett Bowyer is preparing a response to our conditional approval of their Application. I told him to send us their response to the condition dealing with the statistical calculation of the number of concrete samples to be collected from the stockpiles. Brett's message below includes that information.

Please let me know if you can help me with reviewing the information that Brett submitted. I appreciate your help. Unfortunately, we have very tight deadlines in the conditional approval that necessitate quick review and responses from us.

Thank you John, I look forward to your reply.

Cheers, Carmen

Carmen D. Santos PCB Coordinator RCRA Corrective Action Office (WST-5) Waste Management Division USEPA Region 9 415.972.3360

santos.carmen@epa.gov

"Failure is simply the opportunity to begin again, this time more intelligently." Henry Ford

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---- Forwarded by Carmen Santos/R9/USEPA/US on 08/24/2011 12:44 PM ----

From:

To:

Carmen Santos/R9/USEPA/US@EPA

Cc:

""Heriberto Robles" <hrobles@entoserv.com>, "Keith Rudd" <krudd@sunkistgrowers.com>

Date:

08/24/2011 12:04 PM

Subject:

Sunkist Ontario

Hello Carmen,

As we discussed, please find attached a spreadsheet for the statistical evaluation of the data for each discrete crushed concrete stockpile and filled basement that are proposed to be left on Site. Please note that following the additional sampling of the crushed concrete stockpiles per the previously submitted plan (BEC, July 22, 2011), Sunkist made a decision to remove select stockpiles from the Site that we believed would not meet the revised cleanup criteria (4.5mg/kg). The removed crushed concrete stockpiles included, Stockpiles 10, 14, 15, 16, 17 and W-N. In addition, the crushed concrete in

Basement 21 is also to be removed from the Site. The statistical evaluation was not performed on these stockpiles and Basement 21 as the assumption has been made that they will not meet the cleanup criteria and they have, or will be disposed off-Site. Documentation regarding the disposed volumes and disposal facility information will be provided in the Completion Report

For the remaining twelve stockpiles of crushed concrete (Stockpiles 11, 12, 13, 18, 19, 20, 21, A, B, C, D and W-S) and two filled basements (Basement 11 and 64) the statistical evaluation was performed per the methods specified in SW-846 (utilizing the 4.5 mg/kg cleanup value as the regulatory threshold and specific data previously collected from each stockpile and/or basement) to determine the appropriate number of additional samples necessary to complete the characterization of each of the stockpiles and/or basements. The evaluation is provided in attached spreadsheet. As shown, the statistical evaluation of the stockpile specific data utilizing 4.5 mg/kg as the regulatory threshold found that sufficient data was available to characterize each of the stockpiles/basements except for Stockpile D. The SW-846 evaluation determined that thousands of samples would need to be collected from Stockpiles D in order to allow for the UCL determination to be made. As such, it has been decided that Stockpile D will be disposed of off-Site. Documentation regarding the final deposition of Stockpile D will be provided in the Completion Report.

An evaluation of the UCL for Stockpiles 11, 12, 13, 18, 19, 20, 21, A, B, C and W-S, and for Basement 11 and 64 has is also presented in the attached spreadsheet. As shown the UCL for each of these stockpiles and basements is less than the approved 4.5 mg/kg cleanup value. Based on the additional evaluations conducted here, Stockpiles 11, 12, 13, 18, 19, 20, 21, A, B, C and W-S will be utilized to fill low spots and as roadbase on the Site. In addition, the crushed concrete in Basements 11 and 64 will remain in place.

This information will be duplicated as part of our additional submittal that will be provided based on the requirements of the EPA Conditional Approval for the RAP (August 19, 2011). We anticipate providing this additional information by August 25, 2011. In the meantime, could you please provide concurrence that Stockpiles 11, 12, 13, 18, 19, 20, 21, A, B, C and W-S, and Basement 11 and 64 meet the cleanup criteria and can be used as fill and/or roadbase at the Site.

Thank you.

Brett Bowyer, P.G.
Bowyer Environmental Consulting, Inc.
17011 Beach Boulevard, Suite 900
Huntington Beach, CA 92647
Office: (877) 232-4620

Cell: (714) 878-7191 FAX: (714) 840-4963

www.bowyerenvironmental.com



08-23-2011 Stockpile Stats Summary Table.xls

Attachment A

Dust Management Plan

Ambient air will be monitored for the presence of dust throughout active demolition and/or grading operations. Activities monitored will include, but not be limited to crushing of concrete, demolition of above and/or below ground structures, movement of materials, and grading.

The dust measurements will be collected during these activities using a Thermo MIE pDR-1000 DataRam. Measurements will be collected downwind, upwind and within working zones. At a minimum, one measurement will be collected every 15 minutes during ongoing operations. Additional dust measurements will also be obtained along the western fence line to evaluate the potential for dust to migrate off-Site to the nearby residential properties.

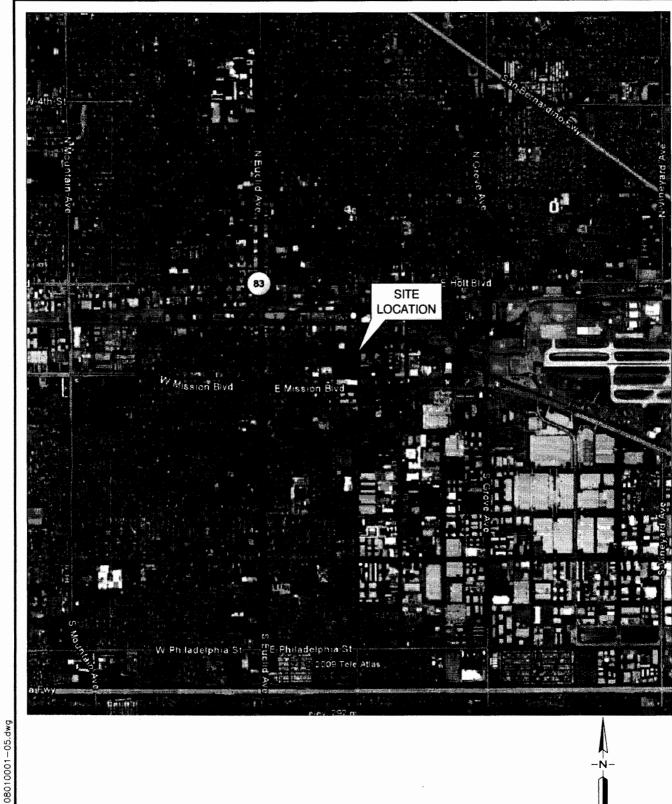
The following sections describe the method utilized to derive action levels associated with the dust monitoring program and mitigation measures that will be taken to limit the amount of dust generated.

Dust Action Level Calculation for the Protection of Onsite Workers

Aroclor 1254 been detected in crushed concrete and soil at the Site. The NIOSH Recommended Exposure Limit (REL) for Aroclor 1254 is 0.001 milligrams per cubic meter (mg/m³). The REL is a time-weighted average (TWA) concentrations for up to a 10-hour workday during a 40-hour workweek, above which inhalation is considered by NIOSH to be a concern. Data collected from soil and crushed concrete samples has detected Aroclor 1254 at up to 27 mg/kg. By conservatively assuming that all dust generated at the Site has an Aroclor 1254 concentration of 27 milligrams per kilogram (mg/kg), the amount of dust in air required to hold no more than 0.001 mg of Aroclor 1254 has been calculated (37.0 milligrams). As such, the conservative dust action level for the protection of onsite workers has been calculated at 37.0 mg/m³. As this number is likely to allow for the presence of significant visible dust, an even more conservative action level of 12 mg/m³ has been established for all work zones at the Site.

Dust Action Level Calculation for the Protection of Offsite Residents

A conservative evaluation of the action level for off-Site dust to residences





BEC

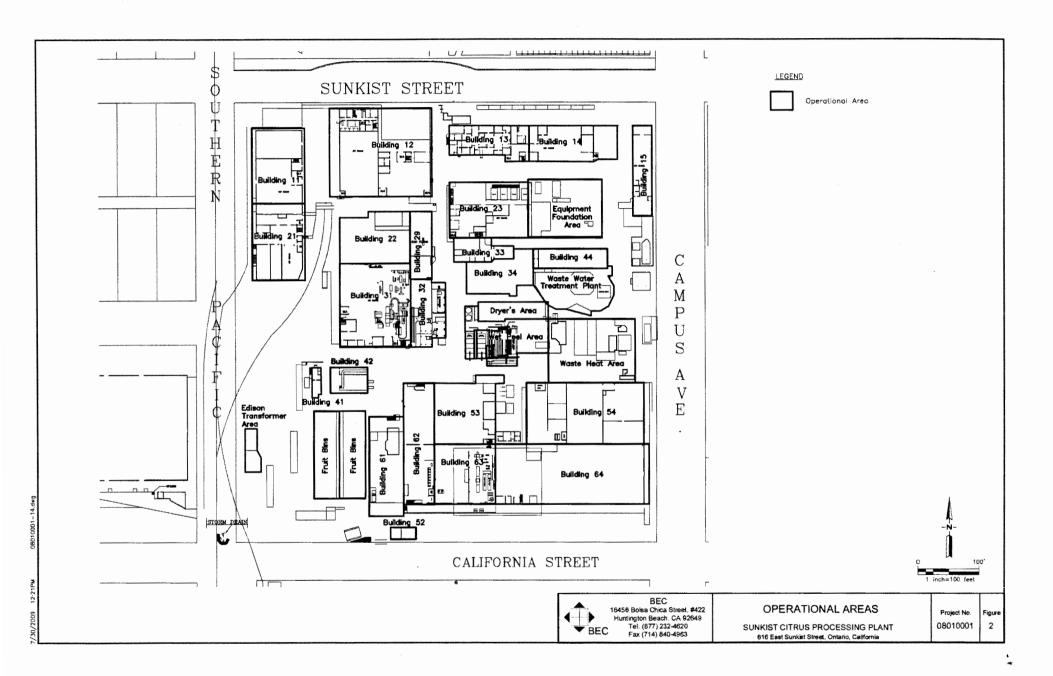
16458 Bolsa Chica Street, #422 Huntington Beach, CA 92649 Tel. (877) 232-4620 Fax (714) 840-4963

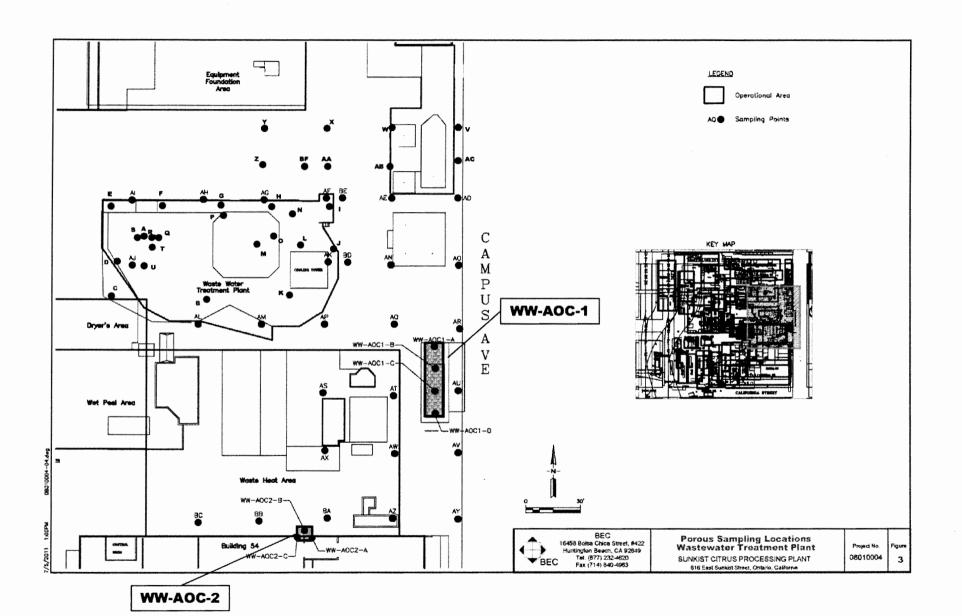
SITE LOCATION MAP

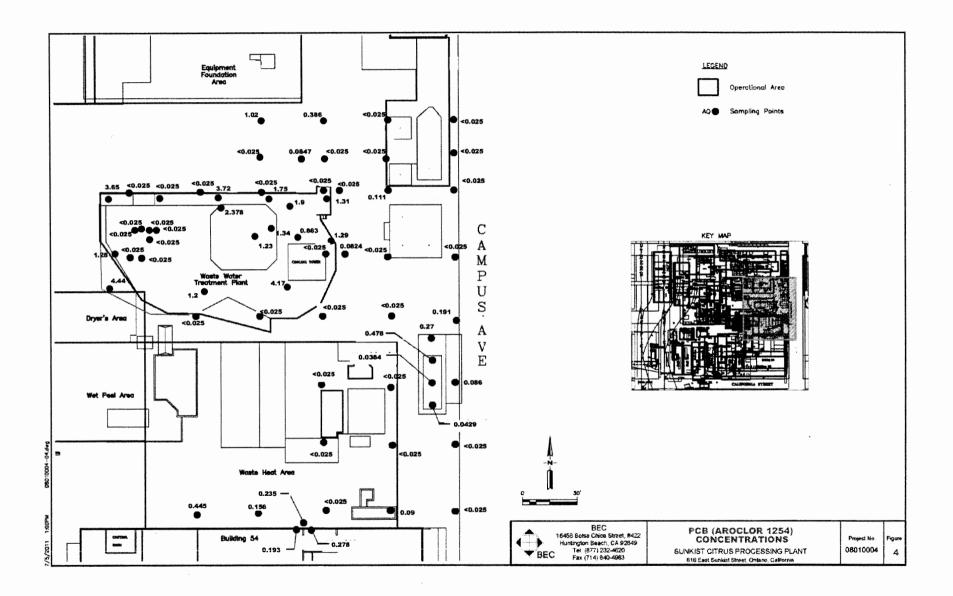
SUNKIST CITRUS PROCESSING PLANT 616 East Sunkist Street, Ontario, California

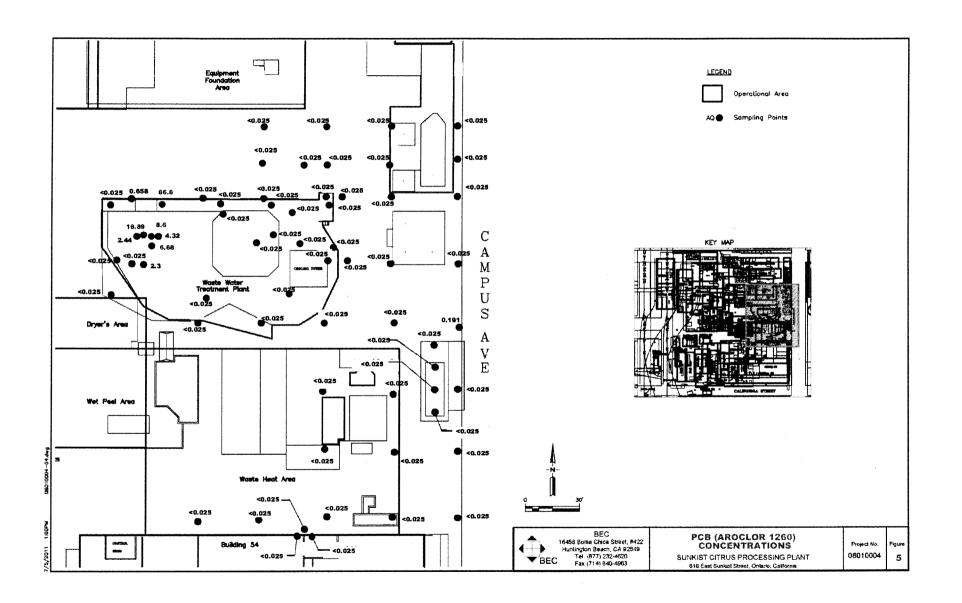
Project No. 08010001 Figure 1

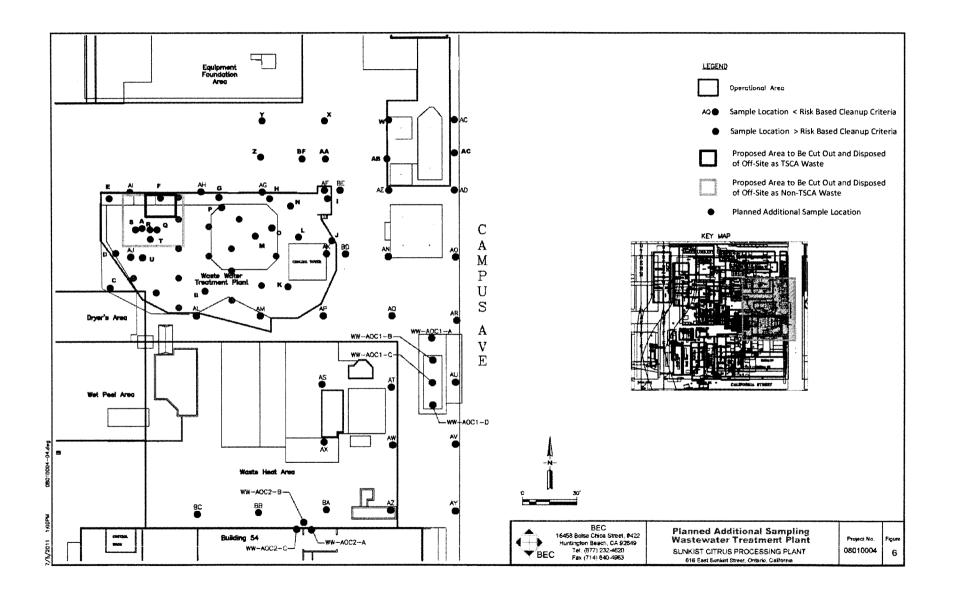
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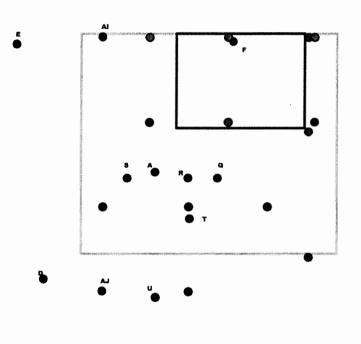












Legend

- Porous Media Sample Location
 < Risk Based Cleanup Criteria
- Porous Media Sample Location
 Risk Based Cleanup Criteria
- Porous Media
 Planned Additional Sample
- Sub-Slab Soil Sample (0-3")
 Planned Additional Sample

Approximate Scale
0 10
In Feet



BEC 17011 Beach Blvd., Suite 900 Huntington Beach, CA. 92647 Tel. (877) 232-4620 Fax (714)840-4963

Soil Sampling
Under Impacted Concrete at WWTP
Former Sunkist Citrus Processing Plant
Ontario, California

Project No. 09002001

Figure No. 7

Table

TABLE 1
PCBs in Porous Material - Wastewater Treatment Plant
Sunkist - Former Citrus Processing Plant
Ontario, CA

								CANADA AND AND AND AND AND AND AND AND AN	
			2 (20)	Mar 15 (8)	4 7 7	THE STATE OF THE S	7.5	75 NASH 14	24 77 SE
Sample Identification	Sample Date	Material Description					1333	33.7	
rosummentos	1.0	RESIDENCE CONTRACTOR	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Axeclar 1248	Agoclor 1254	Aroclar 1260
WW-AOC1-A	6/23/2011	Concrete	<0.025	<0.050	<0.025	<0.025	<0.025	0.27	<0.025
WW-AOC1-B	6/23/2011	Asphalt	<0.025	<0.050	<0.025	<0.025	<0.025	0.478	< 0.025
WW-AOC1-C	6/23/2011	Asphalt	<0.025	<0.050	<0.025	<0.025	<0.025	0.0384	<0.025
WW-AOC1-D	6/23/2011	Asphait	<0.025	<0.050	<0.025	<0.025	<0.025	0.0429	<0.025
WW-AOC2-A	6/23/2011	Asphalt	<0.025	<0.050	<0.025	<0.025	<0.025	0.278	< 0.025
WW-AOC2-B	6/23/2011	Asphalt	< 0.025	<0.050	<0.025	<0.025	< 0.025	0.235	<0.025
WW-AOC2-C	6/23/2011	Asphalt	< 0.025	< 0.050	<0.025	<0.025	< 0.025	0.193	<0.025
WW-A	10/20/2010	Black Grout Between Concrete Slabs	<0.025	< 0.050	<0.025	⊴0.025	< 0.025	< 0.025	19.89
WW-B	6/23/2011	Concrete and Grout Between Concrete Slabs	<0.025	<0.050	<0.025	<0.025	<0.025	1.20	<0.025
ww-c	6/23/2011	Concrete and Grout Between Concrete Slabs	< 0.025	<0.050	<0.025	<0.025	< 0.025	4.44	<0.025
WW-D	6/23/2011	Concrete and Grout Between Concrete Slabs	< 0.025	< 0.050	<0.025	<0.025	< 0.025	1.28	< 0.025
WW-E	6/23/2011	Concrete and Grout Between Concrete Slabs	< 0.025	< 0.050	<0.025	<0.025	< 0.025	3.65	<0.025
WW-F	6/23/2011	Concrete and Grout Between Concrete Slabs	<0.025	<0.050	<0.025	< 0.025	< 0.025	< 0.025	66.60
WW-G	6/23/2011	Concrete and Grout Between Concrete Slabs	<0.025	<0.050	< 0.025	<0.025	< 0.025	3.72	< 0.025
WW-H	6/23/2011	Concrete and Grout Between Concrete Slabs	<0.025	<0.050	<0.025	<0.025	<0.025	1.75	< 0.025
WW-I	6/23/2011	Concrete and Grout Between Concrete Slabs	<0.025	<0.050	<0.025	<0.025	< 0.025	1.31	< 0.025
WW-I	6/23/2011	Concrete and Grout Between Concrete Slabs	<0.025	< 0.050	<0.025	<0.025	<0.025	1.29	< 0.025
WW-K	6/23/2011	Concrete and Grout Between Concrete Slabs	< 0.025	<0.050	<0.025	<0.025	< 0.025	4.17	< 0.025
WW-L	6/23/2011	Concrete and Grout Between Concrete Slabs	< 0.025	< 0.050	<0.025	<0.025	< 0.025	0.863	< 0.025
WW-M	6/23/2011	Concrete and Grout Between Concrete Slabs	<0.025	<0.050	<0.025	<0.025	<0.025	1.23	<0.025
WW-N	6/23/2011	Concrete and Grout Between Concrete Slabs	< 0.025	<0.050	<0.025	<0.025	< 0.025	1.90	<0.025
WW-O	6/23/2011	Concrete and Grout Between Concrete Slabs	<0.025	<0.050	<0.025	<0.025	< 0.025	1.34	< 0.025
WW-P	6/23/2011	Concrete and Grout Between Concrete Slabs	< 0.025	< 0.050	<0.025	<0.025	< 0.025	2.378	<0.025
WW-Q	6/23/2011	Concrete and Grout Between Concrete Slabs	<0.025	< 0.050	<0.025	<0.025	< 0.025	< 0.025	4.32
WW-R	6/23/2011	Concrete and Grout Between Concrete Slabs	<0.025	< 0.050	<0.025	<0.025	< 0.025	<0.025	8.60
WW-S	6/23/2011	Concrete and Grout Between Concrete Slabs	<0.025	< 0.050	<0.025	<0.025	< 0.025	<0.025	244
WW-T	6/23/2011	Concrete and Grout Between Concrete Slabs	<0.025	< 0.050	<0.025	<0.025	< 0.025	< 0.025	6.68
WW-U	6/23/2011	Concrete and Grout Between Concrete Slabs	<0.025	<0.050	<0.025	<0.025	<0.025	< 0.025	2.30
WW-V	6/23/2011	Asphalt	<0.025	< 0.050	<0.025	<0.025	<0.025	<0.025	< 0.025
WW-W	6/23/2011	Concrete	<0.025	<0.050	<0.025	<0.025	< 0.025	<0.025	<0.025
WW-X	6/23/2011	Asphalt	< 0.025	< 0.050	<0.025	<0.025	< 0.025	0.386	< 0.025
WW-Y	6/23/2011	Asphalt	<0.025	< 0.050	<0.025	<0.025	<0.025	1.02	< 0.025
WW-Z	6/23/2011	Asphalt	< 0.025	< 0.050	<0.025	<0.025	< 0.025	< 0.025	<0.025
WW-AA	6/23/2011	Asphalt	< 0.025	<0.050	<0.025	<0.025	< 0.025	< 0.025	<0.025
WW-AB	6/23/2011	Concrete	<0.025	<0.050	<0.025	<0.025	< 0.025	< 0.025	<0.025
WW-AC	6/23/2011	Asphalt	<0.025	< 0.050	<0.025	<0.025	< 0.025	< 0.025	<0.025
WW-AD	6/23/2011	Asphalt	<0.025	<0.050	<0.025	<0.025	<0.025	< 0.025	<0.025
WW-AE	6/23/2011	Asphait	<0.025	<0.050	<0.025	<0.025	< 0.025	0.111	<0.025
WW-AF	6/23/2011	Concrete	<0.025	<0.050	<0.025	<0.025	< 0.025	< 0.025	<0.025
WW-AG	6/23/2011	Concrete	<0.025	<0.050	<0.025	< 0.025	<0.025	<0.025	< 0.025
WW-AH	6/23/2011	Concrete	<0.025	< 0.050	<0.025	<0.025	< 0.025	<0.025	<0.025
WW-AI	6/23/2011	Concrete	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	0.658
WW-AJ	6/23/2011	Concrete	< 0.025	<0.050	<0.025	<0.025	< 0.025	<0.025	<0.025
WW-AK	6/23/2011	Concrete	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
WW-AL	6/23/2011	Concrete	< 0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
WW-AM	6/23/2011	Concrete	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
WW-AN	6/23/2011	Asphalt	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
WW-AO	6/23/2011	Asphalt	<0.025	<0.050	<0.025	<0.025	< 0.025	<0.025	< 0.025
WW-AP	6/23/2011	Asphalt	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	< 0.025
WW-AQ	6/23/2011	Asphalt	< 0.025	<0.030	<0.025	<0.025	< 0.025	<0.025	<0.025
WW-AR	6/23/2011	Asphalt	<0.025	<0.050	<0.025	<0.025	<0.025	< 0.025	0.191

TABLE 1 PCBs in Porous Material - Wastewater Treatment Plant Sunkist - Former Citrus Processing Plant Ontario, CA

Sample identification	Sample Date	Material Description	Arector 1016	Aroclar 1221	Arpeter 1232	Arrector 1242	Aroclar 1246	Axpclor 1254	Arocler 1260
WW-AS	6/23/2011	Concrete	<0.025	< 0.050	< 0.025	<0.025	<0.025	<0.025	< 0.025
WW-AT	6/23/2011	Concrete	<0.025	< 0.050	<0.025	<0.025	<0.025	<0.025	< 0.025
WW-AU	6/23/2011	Concrete	< 0.025	< 0.050	<0.025	<0.025	< 0.025	0.086	< 0.025
WW-AV	6/23/2011	Asphalt	< 0.025	<0.050	<0.025	<0.025	< 0.025	< 0.025	< 0.025
WW-AW	6/23/2011	Concrete	<0.025	< 0.050	<0.025	< 0.025	< 0.025	<0.025	< 0.025
WW-AX	6/23/2011	Concrete	< 0.025	<0.050	< 0.025	< 0.025	<0.025	< 0.025	< 0.025
WW-AY	6/23/2011	Asphalt	< 0.025	<0.050	<0.025	<0.025	< 0.025	< 0.025	< 0.025
WW-AZ	6/23/2011	Concrete	< 0.025	<0.050	< 0.025	<0.025	< 0.025	0.09	<0.025
WW-BA	6/23/2011	Asphalt	< 0.025	< 0.050	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025
WW-BB	6/23/2011	Asphalt	<0.025	< 0.050	< 0.025	< 0.025	< 0.025	0.156	< 0.025
WW-BC	6/23/2011	Asphalt	<0.025	<0.050	<0.025	< 0.025	< 0.025	0.445	< 0.025
WW-BD	6/23/2011	Asphalt	<0.025	< 0.050	< 0.025	<0.025	<0.025	0.0824	<0.025
WW-BE	6/23/2011	Asphalt	<0.025	< 0.050	< 0.025	< 0.025	<0.025	< 0.025	< 0.025
WW-BF	6/23/2011	Asphalt	<0.025	< 0.050	<0.025	< 0.025	< 0.025	0.0847	< 0.025

Notes:

Results given in milligrams per kilogram (mg/kg).
< = Not detected at or above the listed reporting limit.

Attachment A

Laboratory Report – ABC Environmental Laboratories

Mr. Brett Bowyer Bowyer Environmental 16458 Balsa Chica St., #422 HB, CA 92649 6/29/2011 -

Project:

Sunkist

Project Site:

Sunkist

Sample Date:

6/23/2011

Lab Job No.:

B11F025

Dear Mr. Bowyer,

Enclosed please find the analytical report for the samples received by ABC Environmental Laboratories on 6/23/11 and analyzed by the following EPA methods:

EPA 8082(PCBs)

All analyses have met the QA/QC criteria of this laboratory.

The sample(s) arrived in good conditions (i.e., chilled, intact) and with a chain of custoday record attached.

ABC Environmental Laboratories is certified by the CA DHS (Certificate No.2584). Thank you for giving us the opportunity to serve you.

Please feel free to call me at (909)923-8628 if our laboratory can be of further service to you.

Respectfully,

ABC Environmental Laboratories, Inc.

Ken Zheng, M.S.

Laboratory Director

This cover letter is an integral part of this analytical report.

Tel: (909)923-8628

(562)413-8343

Client: Bowyer Environmental Lab Job No.: B11F025

Project: Sunkist Date Sampled: 6/23/2011

Project Site: Sunkist, Ontario Date Received: 6/23/2011

Matrix: Soild(Black Grout Between Concrete Slabs) Date Extracted: 6/25/2011

Extraction Method: EPA 3550C Date Analyzed: 6/26/2011

Batch No.: 0626-PCB-S1 Date Reported: 6/29/2011

EPA 8082 (PCBs)

Reporting Unit: μg/kg (ppb)

DILUTION FACTOR		1	30	40	30	50	50
LAB SAMPLE I.D.		Method	B11F025-1	B11F025-2	B11F025-3	B11F025-4	B11F025-5
CLIENT SAMPLE I.D.		Blank	WW-B	WW-C WW-D		WW-E	WW-F
COMPOUND	RL						
PCB-1016	25	ND	ND	ND	ND	ND	ND
PCB-1221	50	ND	ND	ND	ND	ND	ND
PCB-1232	25	ND	ND	ND	ND	ND	ND
PCB-1242	25	ND	ND	ND	ND	ND	ND
PCB-1248	25	ND	ND	ND	ND	ND	ND
PCB-1254	25	ND	1200	4440	1280	3650	ND
PCB-1260	25	ND	ND	ND	ND	ND	66600
Surrogate Recovery (%QC Limi 65-140							
2,4,5,6-Tetrachloro-m-xylene		82	101	101	113	105	90
Decachlorobiphenyl		90	126	103	109	96	107

RL=Reporting Limit; ND=Not Detected (Below RL x Dilution Factor).

Tel: (909)923-8628 (562)413-8343

^{*:} EPA extraction method 3580 was used as appropriate base on the nature of the sample media (Non-aqueous Solvent Soluble Materials), after this, EPA extraction method 3550C was applied.

Client: Bowyer Environmental Lab Job No.: B11F025 Project: Sunkist Date Sampled: 6/23/2011 Project Site: Date Received: Sunkist, Ontario 6/23/2011 Matrix: Soild(Black Grout Between Concrete Slabs) Date Extracted: 6/25/2011 **Extraction Method: EPA 3550C** Date Analyzed: 6/26/2011 Batch No .: 0626-PCB-S1 Date Reported: 6/29/2011

EPA 8082 (PCBs)

Reporting Unit: μg/kg (ppb)

DILUTION FACTOR		50	50	25	50	50		
LAB SAMPLE I.D.		B11F025-6	B11F025-7	B11F025-8	B11F025-9	B11F025-10		
CLIENT SAMPLE I.D.		WW-G	WW-H	WW-I	WW-J	WW-K		
COMPOUND	RL							
PCB-1016	25	ND	ND	ND	ND	ND		
PCB-1221	50	ND	ND	ND	ND	ND		
PCB-1232	25	ND	ND	ND	ND	ND		
PCB-1242	25	ND	ND	ND	ND	ND		
PCB-1248	25	ND	ND	ND	ND	ND		
PCB-1254	25	3720	1750	1310	1290	4170		
PCB-1260	25	ND	ND	ND	ND	ND		
Surrogate Recovery (%) QC Limit: 65-140								
2,4,5,6-Tetrachloro-m-xylene		94	118	106	96	106		
Decachlorobiphenyl		99	120	116	114	124		

RL=Reporting Limit; ND=Not Detected (Below RL x Dilution Factor).

Tel: (909)923-8628 (562)413-8343

^{*:} EPA extraction method 3580 was used as appropriate base on the nature of the sample media (Non-aqueous Solvent Soluble Materials), after this, EPA extraction method 3550C was applied.

Lab Job No.: B11F025 Bowyer Environmental Client: Sunkist Date Sampled: 6/23/2011 Project: Date Received: 6/23/2011 Project Site: Sunkist, Ontario Soild(Black Grout Between Concrete Slabs) Date Extracted: 6/25/2011 Matrix: Extraction Method: EPA 3550C Date Analyzed: 6/26/2011 6/29/2011 Date Reported: Batch No .: 0626-PCB-S1

EPA 8082 (PCBs)

Reporting Unit: μg/kg (ppb)

			S CHIEF PER IN					
DILUTION FACTOR		30	40	30	50	50		
LAB SAMPLE I.D.		B11F025-11	B11F025-12	B11F025-13	B11F025-14	B11F025-15		
CLIENT SAMPLE I.D.		WW-L	WW-M	WW-N	WW-O	WW-P		
COMPOUND	RL							
PCB-1016	25	ND	ND	ND	ND	ND		
PCB-1221	50	ND	ND	ND	ND	ND		
PCB-1232	25	ND	ND	ND	ND	ND		
PCB-1242	25	ND	ND	ND	ND	ND		
PCB-1248	25	ND	ND	ND	ND	ND		
PCB-1254	25	863	1230	1900	1340	2378		
PCB-1260	25	ND	ND	ND	ND	ND		
Surrogate Recovery (%) QC Limit: 65-140								
2,4,5,6-Tetrachloro-m-xy	lene	98	103	102	113	110		
Decachlorobiphenyl		118	130	120	128	127		

RL=Reporting Limit; ND=Not Detected (Below RL x Dilution Factor).

Solvent Soluble Materials), after this, EPA extraction method 3550C was applied.

Tel: (909)923-8628 (562)413-8343

^{*:} EPA extraction method 3580 was used as appropriate base on the nature of the sample media (Non-aqueous

Client: Bowyer Environmental Lab Job No.: B11F025 Project: Sunkist Date Sampled: 6/23/2011 Project Site: Sunkist, Ontario Date Received: 6/23/2011 Matrix: Soild(Black Grout Between Concrete Slabs) Date Extracted: 6/25/2011 **Extraction Method:** EPA 3550C Date Analyzed: 6/26/2011 Batch No.: 0626-PCB-S1 Date Reported: 6/29/2011

EPA 8082 (PCBs)

Reporting Unit: µg/kg (ppb)

DILUTION FACTOR		35	50	50	50	50
LAB SAMPLE I.D.		B11F025-16	B11F025-17	B11F025-18	B11F025-19	B11F025-20
CLIENT SAMPLE I.D.		WW-Q	WW-R	ww-s	WW-T	ww-u
COMPOUND	RL					
PCB-1016	25	ND	ND	ND	ND	ND
PCB-1221	50	ND	ND	ND	ND	ND
PCB-1232	25	ND	ND	ND	ND	ND
PCB-1242	25	ND	ND	ND	ND	ND
PCB-1248	25	ND	ND	ND	ND	ND
PCB-1254	25	ND	ND	ND	ND	ND
PCB-1260	25	4320	8600	2440	6680	2300
Surrogate Recovery (%)	QC Limit:	65-140				
2,4,5,6-Tetrachloro-m-xyle	ene	70	100	90	74	129
Decachlorobiphenyl		82	120	112	84	131

RL=Reporting Limit; ND=Not Detected (Below RL x Dilution Factor).

Tel: (909)923-8628 (562)413-8343

^{*:} EPA extraction method 3580 was used as appropriate base on the nature of the sample media (Non-aqueous Solvent Soluble Materials), after this, EPA extraction method 3550C was applied.

B11F025 Client: Lab Job No.: Bowyer Environmental Project: Sunkist Date Sampled: 6/23/2011 Project Site: Date Received: 6/23/2011 Sunkist, Ontario Matrix: Date Extracted: 6/24/2011 Solid Extraction Method: EPA 3550C Date Analyzed: 6/25/2011 6/29/2011 Batch No.: Date Reported: 0625-PCB-S1

EPA 8082 (PCBs)

Reporting Unit: µg/kg (ppb)

		Trop or time	Oint. HE KE (P					
DILUTION FACTOR		1	1 .	1	2	2		
LAB SAMPLE I.D.		Method	B11F025-21	B11F025-22	B11F025-23	B11F025-24		
CLIENT SAMPLE I.D.		Blank	WW-V	WW-W	WW-X	WW-Y		
COMPOUND	RL							
PCB-1016	25	ND	ND	ND	ND	ND		
PCB-1221	50	ND	ND	ND	ND	ND		
PCB-1232	25	ND	ND	ND	ND	ND		
PCB-1242	25	ND	ND	ND	ND	ND		
PCB-1248	25	ND	ND	ND	ND	ND		
PCB-1254	25	ND	ND	ND	386	1020		
PCB-1260	25	ND	ND	ND	ND	ND		
Surrogate Recovery (%) QC Limit: 65-140								
2,4,5,6-Tetrachloro-m-xyl	ene	85	72	68	75	78		
Decachlorobiphenyl		89	77	94	86	99		

RL=Reporting Limit; ND=Not Detected (Below RL x Dilution Factor).

Tel: (909)923-8628 (562)413-8343

Client:

Bowyer Environmental

Lab Job No.:

B11F025

Project:

Sunkist

Date Sampled:

6/23/2011

Project Site:

Sunkist, Ontario

Date Received:

6/23/2011

Matrix:

Solid

Date Extracted:

6/24/2011

Extraction Method:

EPA 3550C

Date Analyzed:

6/25/2011

Batch No.:

0625-PCB-S1

Date Reported:

6/29/2011

EPA 8082 (PCBs)

Reporting Unit: μg/kg (ppb)

DILUTION FACTOR		1	1	1	1	11
LAB SAMPLE I.D.		B11F025-25	B11F025-26	B11F025-27	B11F025-28	B11F025-29
CLIENT SAMPLE I.D.		WW-Z	WW-AA	WW-AB	WW-AC	WW-AD
COMPOUND	RL					
PCB-1016	25	ND	ND	ND	ND	ND
PCB-1221	50	ND	ND	ND	ND	ND
PCB-1232	25	ND	ND	ND	ND	ND
PCB-1242	25	ND	ND	ND	ND	ND
PCB-1248	25	ND	ND	ND	ND	ND
PCB-1254	25	ND	ND	ND	ND	ND
PCB-1260	25	ND	ND	ND	ND	ND
Surrogate Recovery (%)	QC Limit	65-140				
2,4,5,6-Tetrachloro-m-xyl	lene	80	94	78	79	86
Decachlorobiphenyl		107	104	101	111	120

RL=Reporting Limit; ND=Not Detected (Below RL x Dilution Factor).

Tel: (909)923-8628 (562)413-8343

Client:Bowyer EnvironmentalLab Job No.:B11F025Project:SunkistDate Sampled:6/23/2011Project Site:Sunkist, OntarioDate Received:6/23/2011

Matrix: Solid Date Extracted: 6/24/2011

Extraction Method: EPA 3550C Date Analyzed: 6/25/2011

Batch No.: 0625-PCB-S1 Date Reported: 6/29/2011

EPA 8082 (PCBs)

Reporting Unit: µg/kg (ppb)

DILUTION FACTOR		1	1	1	1	1
LAB SAMPLE I.D.		B11F025-30	B11F025-31	B11F025-32	B11F025-33	B11F025-34
CLIENT SAMPLE I.D.		WW-AE	WW-AF	WW-AG	WW-AH	WW-AI
COMPOUND	RL					
PCB-1016	25	ND	ND	ND	ND	ND
PCB-1221	50	ND	ND	ND	ND	ND
PCB-1232	25	ND	ND	ND	ND	ND
PCB-1242	25	ND	ND	ND	ND	ND
. PCB-1248	25	ND	ND	ND	ND	ND
PCB-1254	25	111	ND	ND	ND	ND
PCB-1260	25	ND	ND	ND	ND	658
Surrogate Recovery (%)	QC Limit	65-140				
2,4,5,6-Tetrachloro-m-xy	lene	94	87	95	94	84
Decachlorobiphenyl		122	104	110	119	108

RL=Reporting Limit; ND=Not Detected (Below RL x Dilution Factor).

Tel: (909)923-8628 (562)413-8343

Client:

Bowyer Environmental

Lab Job No.:

B11F025

Project:

Sunkist

Date Sampled:

6/23/2011

Project Site:

Sunkist, Ontario

Date Received:

6/23/2011

Matrix:

Batch No .:

Solid

Date Extracted:

Date Analyzed:

6/24/2011 6/25/2011

Extraction Method: EPA 3550C

0625-PCB-S1

Date Reported:

6/29/2011

EPA 8082 (PCBs)

Reporting Unit: µg/kg (ppb)

DILUTION FACTOR		1	1	1	1	1		
LAB SAMPLE I.D.		B11F025-35	B11F025-36	B11F025-37	B11F025-38	B11F025-39		
CLIENT SAMPLE I.I) .	WW-AJ	WW-AK	WW-AL	WW-AM	WW-AN		
COMPOUND	RL							
PCB-1016	25	ND	ND	ND	ND	ND		
PCB-1221	50	ND	ND	ND	ND	ND		
PCB-1232	25	ND	ND	ND	ND	ND		
PCB-1242	25	ND	ND	ND	ND	ND		
PCB-1248	25	ND	ND	ND	ND	ND		
PCB-1254	25	ND	ND	ND	ND	ND		
PCB-1260	25	ND	ND	ND	ND	ND		
Surrogate Recovery (% QC Limit: 65-140								
2,4,5,6-Tetrachloro-m-xylene		90	96	95	87	80		
Decachlorobiphenyl		108	124	112	106	106		

RL=Reporting Limit; ND=Not Detected (Below RL x Dilution Factor).

Tel: (909)923-8628

(562)413-8343

Client:

Bowyer Environmental

Lab Job No.:

B11F025

Project:

Sunkist

Date Sampled:

6/23/2011

Project Site:

Sunkist, Ontario

Date Received:

6/23/2011

Matrix:

Solid

Date Extracted:

6/24/2011

Extraction Method:

EPA 3550C

Date Analyzed:

6/26/2011

Batch No.:

0626-PCB-S2

Date Reported:

6/29/2011

EPA 8082 (PCBs)

Reporting Unit: µg/kg (ppb)

			5 ome party				
DILUTION FACTOR		1	1	11	1	1	
LAB SAMPLE I.D.		Method	B11F025-40	B11F025-41	B11F025-42	B11F025-43	
CLIENT SAMPLE I.D.		Blank	WW-AO	WW-AP	WW-AQ	WW-AR	
COMPOUND	RL						
PCB-1016	25	ND	ND	ND	ND	ND	
PCB-1221	50	ND	ND	ND	ND	ND	
PCB-1232	25	ND	ND	ND	ND	ND	
PCB-1242	25	ND	ND	ND	ND	ND	
PCB-1248	25	ND	ND	ND	ND	ND	
PCB-1254	25	ND	ND	ND	ND	191	
PCB-1260	25	ND	ND	ND	ND	ND	
Surrogate Recovery (%) QC Limit: 65-140 65-140							
2,4,5,6-Tetrachloro-m-xylene		123	94	88	106	107	
Decachlorobiphenyl		135	93	108	120	116	

RL=Reporting Limit; ND=Not Detected (Below RL x Dilution Factor).

Tel: (909)923-8628 (562)413-8343

Client:

Bowyer Environmental

Lab Job No.:

B11F025

Project:

Sunkist

Date Sampled:

6/23/2011

Project Site:

Sunkist, Ontario

Date Received:

6/23/2011

Matrix:

Batch No .:

Solid

Date Extracted:

6/24/2011

Extraction Method:

EPA 3550C 0626-PCB-S2 Date Analyzed:

Date Reported:

6/26/2011 6/29/2011

EPA 8082 (PCBs)

Reporting Unit: μg/kg (ppb)

DILUTION FACTOR		1	1	1	1	1	
LAB SAMPLE I.D.		B11F025-44	B11F025-45	B11F025-46	B11F025-47	B11F025-48	
CLIENT SAMPLE I.D.		WW-AS	WW-AT	WW-AU	WW-AV	WW-AW	
COMPOUND	RL						
PCB-1016	25	ND	NĎ	ND	ND	ND	
PCB-1221	50	ND	ND	ND	ND	ND	
PCB-1232	25	ND	ND	ND	ND	ND	
PCB-1242	25	ND	ND	ND	ND	ND	
PCB-1248	25	ND	ND	ND	ND	ND	
PCB-1254	25	ND	ND	86	ND	ND	
PCB-1260	25	ND	ND	ND	ND	ND	
Surrogate Recovery (%) QC Limit: 65-140							
2,4,5,6-Tetrachloro-m-xylene		92	110	109	119	109	
Decachlorobiphenyl		112	130	120	125	130	

RL=Reporting Limit; ND=Not Detected (Below RL x Dilution Factor).

Tel: (909)923-8628

(562)413-8343

Lab Job No.: B11F025 Client: **Bowyer Environmental** 6/23/2011 Project: Sunkist Date Sampled: Project Site: Sunkist, Ontario Date Received: 6/23/2011 Date Extracted: 6/24/2011 Matrix: Solid EPA 3550C Date Analyzed: 6/26/2011 **Extraction Method:** Batch No.: 0626-PCB-S2 Date Reported: 6/29/2011

EPA 8082 (PCBs)

Reporting Unit: µg/kg (ppb)

DILUTION FACTOR		1	1	1	1	1	
LAB SAMPLE I.D.		B11F025-49	B11F025-50	B11F025-51	B11F025-52	B11F025-53	
CLIENT SAMPLE I.D.		WW-AX	WW-AY	WW-AZ	WW-BA	ww-bb	
COMPOUND	RL						
PCB-1016	25	ND	ND	ND	ND	ND	
PCB-1221	50	ND	ND	ND	ND	ND	
PCB-1232	25	ND	ND	ND	ND	ND	
PCB-1242	25	ND	ND	ND	ND	ND	
PCB-1248	25	ND	ND	ND	ND	ND	
PCB-1254	25	ND	ND	90	ND	156	
PCB-1260	25	ND	ND	ND	ND	ND	
Surrogate Recovery (%) QC Limit: 65-140							
2,4,5,6-Tetrachloro-m-xylene		101	89	79	88	86	
Decachlorobiphenyl		125	100	97	105	101	

RL=Reporting Limit; ND=Not Detected (Below RL x Dilution Factor).

Tel: (909)923-8628 (562)413-8343

Client: **Bowyer Environmental** Lab Job No.: B11F025 Project: Sunkist Date Sampled: 6/23/2011 Project Site: Sunkist, Ontario Date Received: 6/23/2011 Matrix: Solid Date Extracted: 6/24/2011 Extraction Method: EPA 3550C Date Analyzed: 6/26/2011 0626-PCB-S2 Batch No.: Date Reported: 6/29/2011

EPA 8082 (PCBs)

Reporting Unit: µg/kg (ppb)

DILUTION FACTOR	l	1	1	1	· 1	1
LAB SAMPLE I.D.		B11F025-54	B11F025-55	B11F025-56	B11F025-57	B11F025-58
CLIENT SAMPLE I.I	D,	WW-BC	WW-BD	WW-BE	WW-BF	WW-AOC2-A
COMPOUND	RL					
PCB-1016	25	ND	ND	ND	ND	ND
PCB-1221	50	ND	ND	ND	ND	ND
PCB-1232	25	ND	ND	ND	ND	ND
PCB-1242	25	ND	ND	ND	ND	ND
PCB-1248	25	ND	ND	ND	ND	ND
PCB-1254	25	445	82.4	ND	84.7	278
PCB-1260	25	ND	ND	ND	ND	ND
Surrogate Recovery (%	QC Limit:	65-140	•			
2,4,5,6-Tetrachloro-m->	cylene	95	105	82	88	88
Decachlorobiphenyl		98	112	86	86	71

RL=Reporting Limit; ND=Not Detected (Below RL x Dilution Factor).

Tel: (909)923-8628 (562)413-8343

Client: Bowyer Environmental Lab Job No.: B11F025
Project: Sunkist Date Sampled: 6/23/2011

Project Site: Sunkist, Ontario Date Received: 6/23/2011

Matrix: Solid Date Extracted: 6/24/2011

Extraction Method: EPA 3550C Date Analyzed: 6/25/2011

Batch No.: 0625-PCB-S2 Date Reported: 6/29/2011

EPA 8082 (PCBs)

Reporting Unit: µg/kg (ppb)

			orting office pg ng	***		
DILUTION FACTOR		1	1	1	2	2
LAB SAMPLE I.D.		Method	B11F025-59	B11F025-60	B11F025-61	B11F025-62
CLIENT SAMPLE I.D.		Blank	WW-AOC2-B	WW-AOC2-C	WW-AOCI-A	WW-AOCI-B
COMPOUND	RL					
PCB-1016	25	ND	ND	ND	ND	
PCB-1221	50	ND	ND	ND	ND	ND
PCB-1232	25	ND	ND	ND	ND	ND
PCB-1242	25	ND	ND	ND	ND	ND
PCB-1248	25	ND	ND	ND	ND	ND
PCB-1254	25	ND	235	193	270	478
PCB-1260	25	ND	ND	ND	ND	ND
Surrogate Recovery (%)	QC Limit	65-140				
2,4,5,6-Tetrachloro-m-xy	ylene	78	94	96	92	88
Decachlorobiphenyl		78	86	96	96	91

RL=Reporting Limit; ND=Not Detected (Below RL x Dilution Factor).

Tel: (909)923-8628 (562)413-8343

Client:

Bowyer Environmental

Lab Job No.:

B11F025

Project:

Matrix:

Sunkist

Date Sampled:

6/23/2011

Project Site:

Sunkist, Ontario

Date Received:

6/23/2011

_

Solid

Date Extracted:

6/24/2011

Extraction Method:

EPA 3550C

Date Analyzed:

Date Reported:

6/26/2011 6/29/2011

Batch No.:

0626-PCB-S2

EPA 8082 (PCBs)

Reporting Unit: µg/kg (ppb)

DILUTION FACTOR		1	1		
LAB SAMPLE I.D.		B11F025-63	B11F025-64		
CLIENT SAMPLE I.D.	•	WW-AOCI-C	WW-AOCI-D		
COMPOUND	RL				.,
PCB-1016	25	ND	ND		
PCB-1221	50	ND	ND		
PCB-1232	25	ND	ND		
PCB-1242	25	ND	ND		
PCB-1248	25	ND	ND		
PCB-1254	25	38.4	42.9		
PCB-1260	25	ND	ND		
Surrogate Recovery (%)	QC Limi	1 65-140		 	
2,4,5,6-Tetrachloro-m-xy	/lene	101	98		
Decachlorobiphenyl		92	92		

RL=Reporting Limit; ND=Not Detected (Below RL x Dilution Factor).

Tel: (909)923-8628

(562)413-8343

EPA 8082 (PCBs) Batch QA/QC Report

Client:

Bowyer Environmental

Lab Job No.:

B10L060

Project:

Sunkist

Lab Sample ID:

LCS

Matrix:

Solid

Date Analyzed:

6/26/2011

Batch No .:

0626-PCB-S1

Date Reported:

6/29/2011

MB/LCS/LCSD Report

Unit: ug/kg

Analyte	Method	Spike	LCS	LCSD	LCS	LCSD	%RPD	%RPD	%Rec.
	Blank	Conc.	200	2002	%Rec.	%Rec.	70202	Accept	Accept
	Ball	cone.			701cc.	yorce.		Limit	Limit
PCB-1254	ND	500	543	556	109	111	2	≤30	75-130
Surrogate Reco	overy (%)								
2,4,5,6-TCMX	82				80	78			65-140
DCP	90				75	69			65-140

ND: Not Detected (Below RL).

Tel: (909)923-8628 (562)413-8343

EPA 8082 (PCBs) Batch QA/QC Report

Client:

Bowyer Environmental

Lab Job No.:

B11F025

Project:

Sunkist

Lab Sample ID:

B11F025-21

Matrix:

Solid

Date Analyzed:

6/25/2011

Batch No .:

0625-PCB-S1

Date Reported:

6/29/2011

I. MS/MSD Report

Unit: ug/kg

				Onit. ug/					
Analyte	Sample	Spike	MS	MSD	MS	MSD	%RPD	%RPD	%Rec.
	Conc.	Conc.			%Rec.	%Rec.		Accept	Accept
								Limit	Limit
PCB-1254	ND	500	497	552	99	110	10	≤30	75-135
Surrogate Recov	ery (%)								
2,4,5,6-TCMX	72				68	72			65-140
DCP	77				81	91			65-140

II. MB/LCS Report

Unit: ug/kg

Analyte	Method	Report	True	Rec.%	Accept
	Blank	Value	Value		Limit
PCB-1254	ND	502	500	100	70-130
Surrogate Recov	ery (%)				
2,4,5,6-TCMX	85	74		91	65-140
DCP	89	69		86	65-140

ND: Not Detected (Below RL).

MB: Method Blank.

Tel: (909)923-8628 (562)413-8343

EPA 8082 (PCBs) Batch QA/QC Report

Client:

Bowyer Environmental

Lab Job No.:

B11F025

Project:

Sunkist

Lab Sample ID:

B11F025-52

Matrix:

Solid

Date Analyzed:

6/25/2011

Batch No.:

0625-PCB-S2

Date Reported:

6/29/2011

I. MS/MSD Report

Unit: ug/kg

				Onit. ug/					
Analyte	Sample	Spike	MS	MSD	MS	MSD	%RPD	%RPD	%Rec.
	Conc.	Conc.			%Rec.	%Rec.		Accept	Accept
								Limit	Limit
PCB-1254	ND	500	540	594	108	119	10	≤30	75-135
Surrogate Recov	very (%)								
2,4,5,6-TCMX	119				84	80			65-140
DCP	125				98	79			65-140

II. MB/LCS Report

Unit: ug/kg

Analyte	Method	Report	True	Rec.%	Accept
	Blank	Value	Value		Limit
PCB-1254	ND	545	500	109	70-130
Surrogate Recov	ery (%)				
2,4,5,6-TCMX	123	72			65-140
DCP	135	89			65-140

ND: Not Detected (Below RL).

MB: Method Blank.

Tel: (909)923-8628

(562)413-8343 Fax: (909)923-8628

EPA 8082 (PCBs) Batch QA/QC Report

Client:

Bowyer Environmental

Lab Job No.:

B11F025

Project:

Sunkist

Lab Sample ID:

LCS

Matrix:

Solid

Date Analyzed:

6/26/2011

Batch No .:

0626-PCB-S2

Date Reported:

6/29/2011

MB/LCS/LCSD Report

Unit: ug/kg

				O III ti de	·				
Analyte	Method	Spike	LCS	LCSD	LCS	LCSD	%RPD	%RPD	%Rec.
	Blank	Conc.			%Rec.	%Rec.		Accept	Accept
								Limit	Limit
PCB-1254	ND	500	589	461	118	92	24	≤30	75-130
Surrogate Recov	ery (%)								
2,4,5,6-TCMX	123				80	79			65-140
DCP	135				82	97		65-140	

ND: Not Detected (Below RL).

MB: Method Blank.

Tel: (909)923-8628 (562)413-8343

1640B S. Grove Ave., Ontario, CA 91761

Tel: 562-413-8343

Tel/ Fax: 909-923-8628

CHAIN OF CUSTODY

Page 1 of 5

Lab Job Number 311F025

Client Name	EC	,						Samp	le Rece	eipt					F	۱na	lys	es l	Req	ues	stec	d		Turn Around Time Requested
Address Toll Be Report Attention Die +1	Phone Fax: #	#877	237-1	462	O Samp	oled B	ņ	<u> </u>	Chilled Intact		A Oxygenates)	Oxygenates)	& MTBE)	EPA8015M / 8015B (Gasoline)	3 (Diesel)	ilorine Pesticides)			n Chain))			٠	☐ Rush 8 12 24 48 Hours
Project No./ Name	Project	SiteScr	nkis	16	Intar	1 70			Sample	e Seal	(VOCs &	3TEX &	(втех	7 8015E	/ 8015E	(Organochlorine	(PCBs)	(тврн)	(Carbo	(Metals	tals			™ iNormai
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WW-B	ESII	Fors-)	6/23/	4	8:40	S	L	ICE	1-	G							Δ							
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UW-D		-3		-	8:50																			
WW-É		-4			8:55																			
WW-F		小			9:00																			
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WW-H		~7			9:10																			
WW-I		-8			11:7																			
WW-2		-9			4:12																			
WW-K		10			9:13																			
WW-L		-11			9:25	***************************************				<u></u>								İ						
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Matrix Code:

DW-Drinking Water GW=Ground Water WW=Waste Water SD=Solid Waste

SL=Sludge SS=Soil/Sediment AR=Air PP=Pure Product

Preservative Code

IC=Ice HC-HCI HN=HNO3 SH=NaOH ST=Na₂S₂O₃ HS=H2SO4

* Sample Container Types: TarTediar Air Bag G=Glass Container ST = Steel Tube

B= Brass Tube P=Plastic Bottle V=VOA Vial

Environmental Laboratories, Inc.

AB		nviron	mental	164 Tel	10B S. Gi	rove Ave., (Ontai	rio, C	CA-9	176	1		,				Pa	age _	7	7	_ of _ 5 er B 6	
AD'		aborat	ories, Inc	C. Tel	/ Fax: 909	9-923-8628	C	H/	11/	1	OF	C	US	江	O	YC	La	ab Joi	bΝ	umbe	er B // F	221
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Address 1701 Beac Report Attention Brett	Phone #877 Fax: #	232-4	1620 Sam	pled By		ntact	Oxyge	Oxyge	MTBE	(Gaso	(Diese	rine Pes			Chain)		_				8 12 24 4 Hours	18
Project	Project Site C	V. L.	24 6.1	114 r.	- i				rex &	0158	015B	panochio	Bs)	PH)	arbon	etals)	s				, ENormal	
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Preservative Code

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 Sample Container Types: T=Tedlar Air Bag G=Glass Container ST= Steel Tube

B= Brass Tube P=Plastic Bottle V=VOA Vial

1640B S. Grove Ave., Ontario, CA-91761

Tel: 562-413-8343

Tel/ Fax: 909-923-8628 CHAIN OF CUSTODY

Page 3 of 5. Lab Job Number 11F025

Client Name	BEC			MARTINIA PRIMITA DE LA		Sample	e Receipt					A	۱na	lys	es l	₹eq	ue	stec	d			Turn Around Time Requested
Address 17011 Report Attention	Bea	ch Bl	VD s	Suite 96	Died By		Chilled	Oxygenates)	Oxygenates)	MTBE)	8015B (Gasoline)	esel)	EPA8081A (Organochiorine Pesticides)			Chain)						☐ Rush 8 12 24 48 Hours
	Fax:	# 0 / 1		620 Sam	ly Pe		ntact	∞ত	∞ಶ	∞	5B (G	5B (D)	xch!orin		_	on C	lls)	•				Mormal
Project No./ Name	Proje	ct Site Si	nkrst	Ontar	10		Sample Seal	(VOCs	втех	(втех		/ 801	(Огдалс	PCBs	TRPH	(Carb	(Meta	etals				ş.
Client	1	Lab	Sample	Collection	Matrix	Sample	No., type*	260B	EPA8260B(BTEX	EPA8021B	EPA8015M	EPA8015M / 8015B (Diesel)	081A	EPA 8082 (PCBs)	EPA418.1 (TRPH)	EPA8015M (Carbon	EPA 7000s (Metals)	CAM 17 Metals			2	Remarks
Sample ID	San	nple ID	Date	Time	Type	Preserve	container		EPA8	EPA8	EPA8	EPA8	EPA8	EPA 8	EPA4	EPA8	EPA 7	CAM				Hemans
WW-AF	Est	11fo25-3]	6/23/1	17:70	S	ICE	1-9							X								
WW-AG	1	<u>-3z</u>		12:25			<u> </u>							\perp								
WW-AH		-33		1:70										\perp								
WW-AI		-34		1:25				<u> </u>						1								
WW-AJ		35		1:30		 								\bot						_		
WW-AK		-36		1:50										_							_	`
WW-AL		-37		7:00		<u> </u>								+								
WW-AM		-38		2:05		<u> </u>		_						-					\vdash	\dashv	_	
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WW-AO		-40		2:20				<u> </u>						+								
WW-AP		-9/		2:25	-			_						+	÷.							
WW-AQ		-42		2:30				_						-		-						
WW-AK		-43		2:35										-						-		
WW-A 3		-44	1	2:40	-		 	<u> </u>						L						-	_	
WW-AT	<u></u>	/ -(L) Company	Date /	2:45 Time	Rec	eived By	Company			ate	T	Ţim	e	+		1						
Relinquished By	4	BEC	5c 6/23/11 6:00PM -J-Jun					BC/GBS 6/23/11 6:00PM				Note: Samples are discarded 30 day reported unless other arrange						0 days angen	after results are nents are made.			
Tiomiquipaed by	Company Date Time Rec						- Company		L					<u></u>								

Matrix Code:

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ST= Stee! Tube

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ABC

Environmental Laboratories, Inc.

1640B S. Grove Ave., Ontario, CA 91761

Tel: 562-413-8343-

Tel/ Fax: 909-923-8628

CHAIN OF CUSTODY Page 4 of 5 Lab Job Number 8 1/F025 Client Name **Analyses Requested** Turn Around Sample Receipt Time Requested Conditions Address Oxygenates) Oxygenates) EPA8015M / 8015B (Gasoline) ☐ Rush (7011 M Chilled EPA8015M / 8015B (Diesel) EPA8021B (BTEX & MTBE) Chain) 8 12 24 48 Report Attention Hours EPA8081A (Organochiorine 10 Intact ∞ EPA8015M (Carbon EPA 7000s (Metals) EPA8260B(BTEX & **₩**ormal EPA418.1 (TRPH) Project Sit& Project EPA 8082 (PCBs) □ Sample Seal CAM 17 Metals No./ Name EPA8260B (Sample Collection Lab Matrix Sample No., type* Client & size of Remarks Sample ID Preserve Type Sample ID Date Time container ESIIFOX-4/6/23/11 3:00 1-G ICE 3:15 3:70 3:25 3:30 3740 3:45 3:55 400 4157 4:55 5100 4:15 4170 Campany BEC Received By Date Company Time Date 6:00 PM Note: Samples are discarded 30 days after results are 6200PM ABC LABS reported unless other arrangements are made. Date Time Received By Company Company

Matrix Code:

DW=Drinking Water GW=Ground Water WW. Waste Water SD=Solid Waste

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AB	C En	vironm borato	ental ries, In	164 — Tel: C. Tel/	0B S. Gr 562-413 Fax: 909	rove Ave., C 3-8343 9-923-8628	nta C	rio, C	CA 9	176	ı Of	C	U:	31	OI	ΟY	Pa La	ige ib Jo	5 >b No	ımbe	_ of . er <u>B</u>	5 11F025
Client Name	BEC				Sample	Sample Receipt Conditions			Analyses Requeste									t				Turn Around me Requested
Address Report Attention	Phone #877232-4620 Sampled By Fax: # Project Site Suk ist Ortanto			1 C	Conditions Chilled Intact Sample Seal		EPA8260B(BTEX & Oxygenates)	EPA8021B (BTEX & MTBE)	EPA8015M / 8015B (Gasoline)	EPA8015M / 8015B (Diesel)	EPA8081A (Organochitorine Pesticides)	(sg.)	ПРН)	(Carbon Chain)	(Metals)	tals				8	Rush 3 12 24 48 Hours Normal	
Client Sample ID	Lab Sample ID	Sample C Date	Collection Time	Matrix	Sample Preserve	No., type* & size of container	8260B	EPA8260B(I	EPA8021B (EPA8015M	EPA8015M	EPA8081A (EPA 8082 (PCBs)	EPA418.1 (TRPH)	EPA8015M (Carbon	EPA 7000s (Metals)	CAM 17 Metals					Remarks
WW-AOCIA	B111025-61	6/23/4	4:35	5 5	74	1-9				***************************************		-	X									
WW-AOCZ-B WW-AOCZ-C	1-62		4:38																			
WW-ACCI-C	-63		414(<u> </u>										,							***************************************
WW-ACCI-D	V-64	V	4:46	· •	V_	V					•	<i>,</i> ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	Y			Micogramman.						MINING TO THE STATE OF THE STAT
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Relinquished By Willy Loris Relinquished By	1 BEC	C/2J/U Date	Time Book Time	MITT	ved By ved By	Company ABC La Company	bs	6:	ate	74	6/2 Time		No									results are are made.

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		•

Bowyer Environmental Consulting



August 29, 2011

VIA ELECTRONIC AND U.S. MAIL

Ms. Carmen Santos Waste Management Division U.S. Environmental Protection Agency Region 9 75 Hawthorne Street San Francisco, CA 94105

Subject:

Porous Media Sampling and Removal Action Plan

Wastewater Treatment Plant

Former Sunkist Citrus Processing Plant

616 E. Sunkist Street Ontario, California

Dear Ms. Santos:

Bowyer Environmental Consulting, Inc. (BEC) has prepared this data summary and removal action plan (Report) in association with porous media at the Wastewater Treatment Plant (WWTP), which is part of the Sunkist Growers, Inc. (Sunkist) former Citrus Processing Plant (Site). The Site is located at 616 E. Sunkist Street in the Ontario, California. The Site location is shown on Figure 1. The facilities prior to demolition activities are depicted on Figure 2.

The work summarized in this Report, which consisted of the collection/analysis of a series of porous media samples for the presence of polychlorinated biphenyls (PCBs), was conducted per the approved email work scope that was submitted to the United States Environmental Protection Agency (EPA) on June 22, 2011. The EPA approved the work scope via email correspondence that was received on June 22, 2011. The removal action activities presented in this Report are consistent with the application for the cleanup of PCB remediation waste (BEC, May 22, 2011), which was conditionally approved by the EPA on August 19, 2011.

Ms. Carmen Santos August 29, 2011 Page 2

The primary objective of the sampling program presented in this Report was to characterize porous materials prior to demolition. The goal of the removal action activities provided in this Report are to separate and properly dispose of (off Site) of porous media that is in excess of the approved risk-based cleanup goals prior to demolition of the WWTP foundations.

BACKGROUND

The WWTP was modified during a major capital expenditure program conducted approximately 10 years ago by Sunkist. During this program, entirely new above ground features were installed to facilitate a larger and more efficient WWTP (Modified WWTP) as, at the time, there was no plan to demolish the facility. The Modified WWTP encompassed an area of approximately 36,000 square feet. Figure 3 shows the primary features associated with the Modified WWTP.

It is probable that certain previously existing foundations associated with the historical facilities were utilized to support the new above-grade structures associated with the Modified WWTP. In October 2010, during a sampling program associated with the pre-demolition characterization of porous media sampling at Buildings 12 and 15, a single porous media sample (WW-A) was collected from an expansion joint associated with the primary foundation at the WWTP. This sample (designated "A", at the location shown on Figure 3) was found to contain 19.89 milligrams per kilogram (mg/kg) of PCBs (Aroclor 1260). This result supported the conclusion that the foundations associated with the current WWTP predated the modifications made approximately 10 years ago, as PCBs were not being used in construction materials during this time period (2000 to 2002). Based on these results, the EPA requested the implementation of a porous media sampling effort of the foundations at the WWTP prior to demolition.

SCOPE OF SAMPLING PROGRAM

The porous media sampling program at the WWTP was conducted on June 23, 2011. A total of 64 porous media samples were collected during this effort. Sample collection locations are shown on Figure 3.

Ms. Carmen Santos August 29, 2011 Page 4

material was collected from each sampling location. The ground sampling material was placed into a pre-cleaned, laboratory provided 4-ounce glass container with a Teflon-lined lid.

The samples were sealed, labeled and placed in a refrigerated container for transport to ABC Environmental Laboratories (ABC) in Ontario, California for analysis. A chain-of-custody form was completed upon sample collection and accompanied the samples to ABC. ABC analyzed each of the samples for PCBs by EPA Method 8082. Extractions for the samples (asphalt and concrete) were performed via EPA Method 3500B. Specifically, the concrete and asphalt was extracted by ultrasonic extraction (EPA Method 3550), and the dark-colored, fibrous grout was analyzed by solvent dilution (EPA Method 3580), as required under EPA Method 3500B for non-aqueous, solvent-soluble material. The analytical laboratory reports produced by ABC are provided in Appendix A.

PROGRAM RESULTS

The results from the recent and previous sampling efforts at the WWTP (including WW-A) are summarized on Table 1. As shown two aroclors (Aroclor 1254 and Aroclor 1260) were observed during this testing program. Aroclor 1254 was detected in 30 of the 65 samples (46%) at relatively low concentrations. The lowest detected concentration of Aroclor 1254 was 0.0384 milligrams per kilogram (mg/kg) and the highest detected concentration was 4.44 mg/kg. Aroclor 1260 was only detected in 9 of the 65 samples (14%) but was observed at higher concentrations. The lowest detected concentration of Aroclor 1260 was 0.191 milligrams per kilogram (mg/kg) and the highest detected concentration was 66.6 mg/kg. The detected concentrations of Aroclor 1254 and Aroclor 1260 are posted on Figures 4 and 5, respectively.

Based on the results, only four samples were found to be in excess of the approved risk-based cleanup criteria (USEPA, August 19, 2011). These samples (WW-A, WW-F, WW-R, and WW-T) all originated from the dark-colored, fibrous grout material. One of these samples (WW-F) had a concentration (66.6 mg/kg) in excess of the TSCA waste disposal criteria. All of these four samples were clustered in the western portion of the main concrete slab associated with the WWTP, as shown on Figure 5.

Ms. Carmen Santos August 29, 2011 Page 6

residences was calculated based on the most elevated concentration of PCBs in crushed concrete and the concentration in air that is protective of residential receptors per the EPA Regional Screening Levels (RSLs) table. According to the RSL table, an Aroclor 1254 concentration in air equal to 4.3E-03 ug/m³ is protective of residential receptors. Data collected from crushed concrete samples has detected Aroclor 1254 at up to 27 mg/kg (please note that the limited area of uncrushed concrete on the WWTP that contained up to 66.6 mg/kg of Aroclor 1260 will not be crushed and it is not likely that a significant amount of dust will be generated during the removal of this material). Assuming all dust generated at the Site had an Aroclor 1254 concentration of 27 mg/kg, the amount of dust in air required to hold no more than 4.3E-03 micrograms of Aroclor 1254 is 0.159 milligrams. Thus, the conservative dust action level for the protection of off-Site residential receptors is 0.159 mg/m³. If at any time the action levels in the work zones (12ug/m³) or along the western fence line (0.159 mg/m³) are found to be exceeded due to on-Site activities, additional dust suppression activities will be implemented. These additional dust suppression activities will involve the application of additional water or dust suppression agent such as SoilTac tm or Gorilla Snottm, if necessary.

This work is scheduled to begin on August 29, 2011. It will take approximately one week to complete. A summary of this effort will be provided in the completion report associated with the PCB remediation waste cleanup application.

CLOSING

This data summary and removal action plan was prepared in association with porous media sampling and planned removal actions associated with the former WWTP, of the former Citrus Processing Plant Ontario, California. The sampling program was conducted per an approved work scope, and the removal program will be done in compliance with the approved PCB remediation waste cleanup application. If you have any questions regarding this document, please feel free to call.

Sincerely,

Brett H. Bowyer, P.G.

Figures

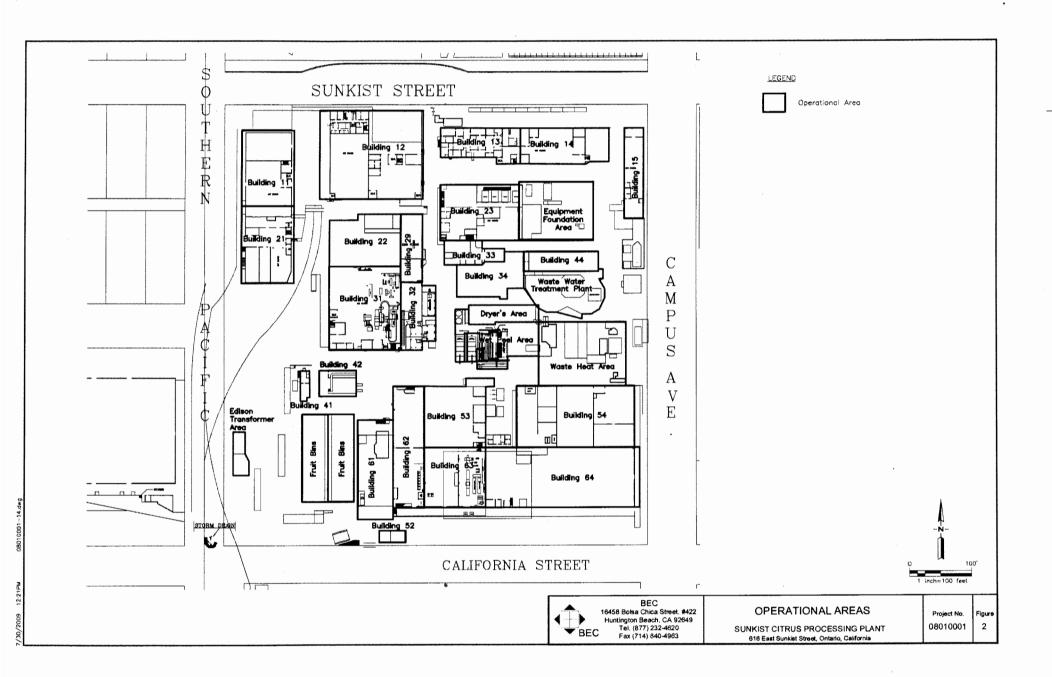
BEC 16458 Bolsa Chica Street, #422 Huntington Beach, CA 92649 Tel. (877) 232-4620

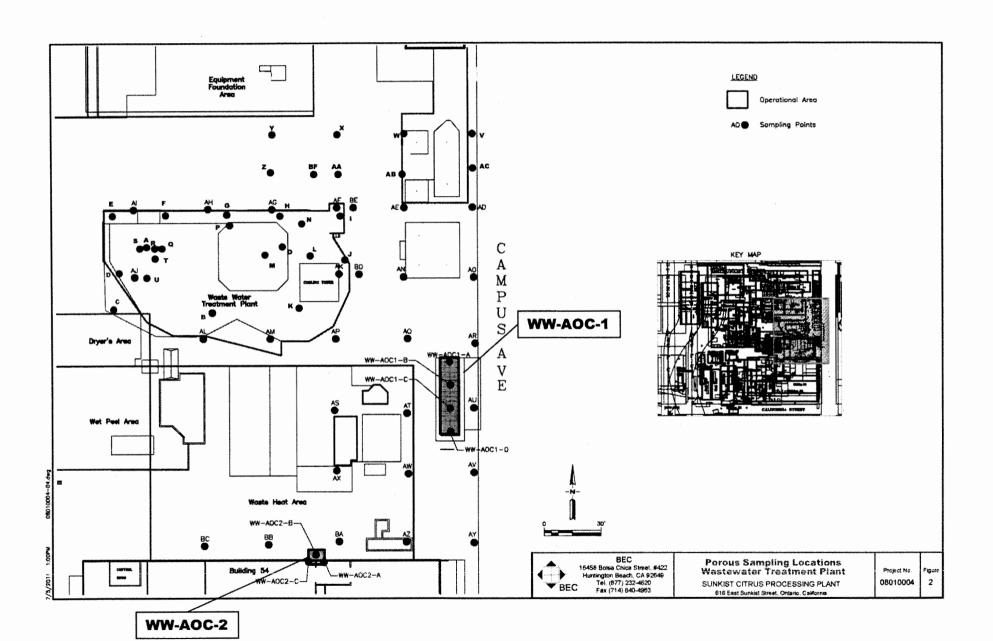
Fax (714) 840-4963

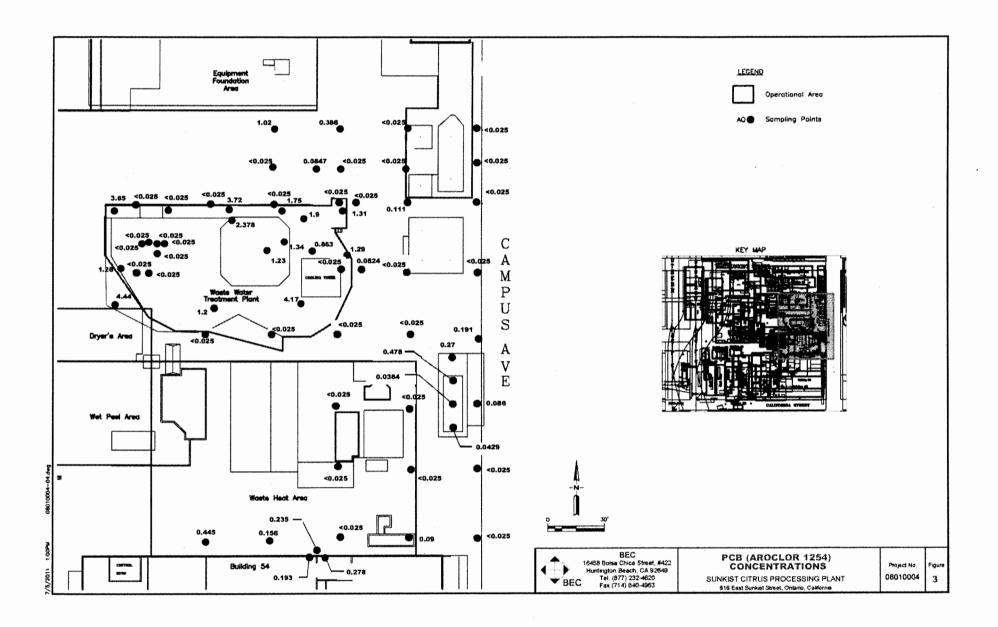
SITE LOCATION MAP

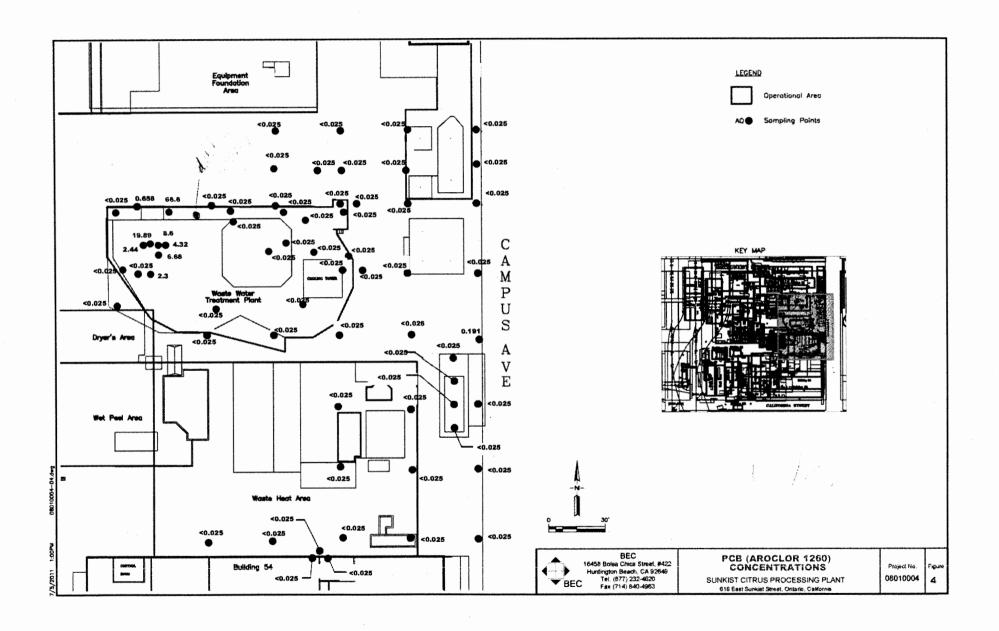
SUNKIST CITRUS PROCESSING PLANT 616 East Sunkist Street, Ontario, California

Project No. 08010001 Figure 1









Table

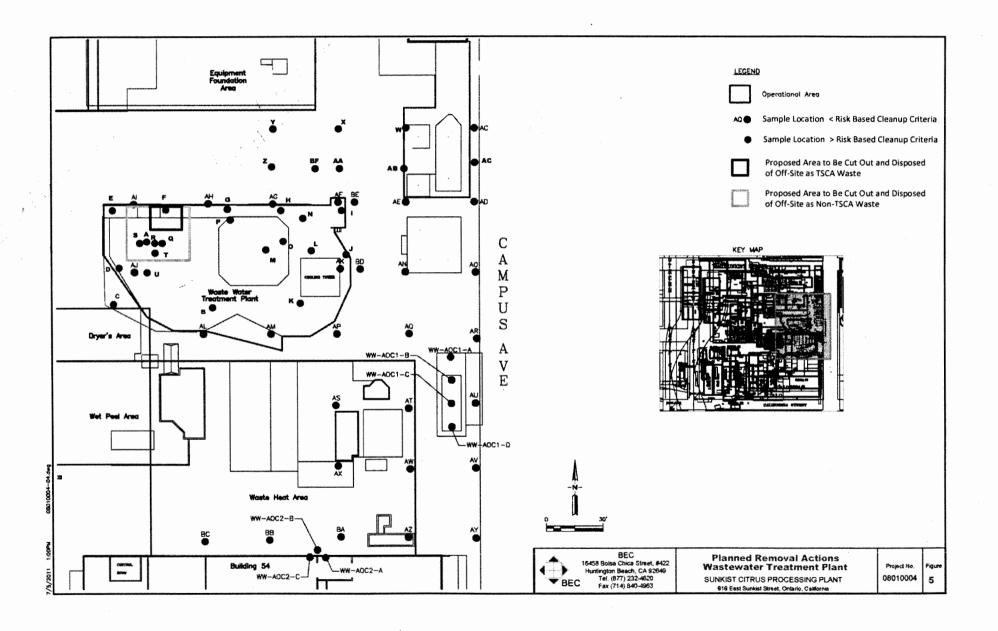


TABLE 1 PCBs in Porous Material - Wastewater Treatment Plant Sunkist - Former Citrus Processing Plant Ontario, CA

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Sample	Samule Date	Malerial Description		-6.5 3.43	4 4 10	Apple 174	1.37	Maria di F	76
Identification	Orange Date		Areclar 1016	Ameleg 1221	Atoclar 1232	Aredor 1242	Aroclar 1246	Arector 1254	Amelor 1260
	37.0		77.0	4 3 35317	2.2	11116	*4.00	G 17 347	W. H. 1971
WW-AOC1-A	6/23/2011	Concrete	<0.025	<0.050	<0.025	<0.025	<0.025	0.27	<0.025
WW-AOC1-B	6/23/2011	Asphalt	<0.025	<0.050	<0.025	<0.025	<0.025	0.478	<0.025
WW-AOCI-C	6/23/2011	Asphait	<0.025	<0.050	<0.025	<0.025	<0.025 <0.025	0.0384	<0.025 <0.025
WW-ACC1-D	6/23/2011	Asphalt	<0.025	<0.050	<0.025	<0.025 <0.025	<0.025	0.0429	<0.025
WW-AOC2-A WW-AOC2-B	6/23/2011	Asphalt	<0.025	<0.050	<0.025	<0.025	<0.025	0.235	<0.025
WW-AOC2-B	6/23/2011	Asphalt Asphalt	<0.025	<0.050	<0.025	<0.025	<0.025	0.193	<0.025
WW-ACC2-C	10/20/2010		<0.025	<0.050	<0.025 <0.025	<0.025	<0.025	<0.025	19.89
WW-B		Black Grout Between Concrete Slabs	<0.025	<0.050	<0.025	40.025	<0.025	1.20	<0.025
WW-C	6/23/2011	Concrete and Grout Between Concrete Slabs Concrete and Grout Between Concrete Slabs	<0.025	<0.050	<0.025	<0.025	<0.025	1.14	<0.025
WW-D	6/23/2011	Concrete and Grout Between Concrete States Concrete and Grout Between Concrete States	<0.025	<0.050	<0.025	<0.025	<0.025	1.28	<0.025
WW-E	6/23/2011	Concrete and Grout Between Concrete Stats Concrete and Grout Between Concrete Stats	<0.023	<0.050	<0.025	<0.025	<0.025	3,65	<0.025
WW-F	6/23/2011	Concrete and Grout Between Concrete Slabs	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	66.60
WW-G	6/23/2011	Concrete and Grout Between Concrete Stats	<0.025	<0.050	<0.025	<0.025	<0.025	3.72	<0.025
WW-H	6/23/2011	Concrete and Grout Between Concrete Slabs	<0.025	<0.050	<0.025	<0.025	<0.025	1.75	<0.025
WW-1	6/23/2011	Concrete and Grout Between Concrete Slabs	<0.025	<0.050	<0.025	<0.025	<0.025	1.31	<0.025
WW-I	6/23/2011	Concrete and Grout Between Concrete Slabs	<0.025	<0.050	<0.025	<0.025	<0.025	1.29	<0.025
WW-K	6/23/2011	Concrete and Grout Between Concrete Slabs	<0.025	<0.050	<0.025	<0.025	<0.025	4.17	<0.025
WW-L	6/23/2011	Concrete and Grout Between Concrete Slabs	<0.025	<0.050	<0.025	<0.025	< 0.025	0.863	<0.025
WW-M	6/23/2011	Concrete and Grout Between Concrete Slabs	<0.025	<0.050	40.025	<0.025	<0.025	1.23	<0.025
WW-N	6/23/2011	Concrete and Grout Between Concrete Slabs	<0.025	<0.050	<0.025	<0.025	<0.025	1.90	<0.025
WW-O	6/23/2011	Concrete and Grout Between Concrete Slabs	<0.025	<0.050	<0.025	<0.025	<0.025	1.34	<0.025
WW-P	6/23/2011	Concrete and Grout Between Concrete Slabs	<0.025	<0.050	<0.025	<0.025	<0.025	2.378	<0.025
WW-O	6/23/2011	Concrete and Grout Between Concrete Slabs	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	4.32
WW-R	6/23/2011	Concrete and Grout Between Concrete Slabs	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	8.60
WW-S	6/23/2011	Concrete and Grout Between Concrete Slabs	<0.025	< 0.050	<0.025	<0.025	<0.025	<0.025	2.44
WW-T	6/23/2011	Concrete and Grout Between Concrete Slabs	< 0.025	<0.050	<0.025	< 0.025	<0.025	< 0.025	6.68
WW-U	6/23/2011	Concrete and Grout Between Concrete Slabs	<0.025	< 0.050	<0.025	<0.025	< 0.025	< 0.025	2.30
WW-V	6/23/2011	Asphalt	< 0.025	<0.050	<0.025	<0.025	<0.025	<0.025	< 0.025
WW-W	6/23/2011	Concrete	< 0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
WW-X	6/23/2011	Asphalt	<0.025	<0.050	<0.025	<0.025	<0.025	0.386	< 0.025
WW-Y	6/23/2011	Asphalt	< 0.025	< 0.050	<0.025	<0.025	<0.025	1.02	< 0.025
WW-Z	6/23/2011	Asphalt	<0.025	<0.050	<0.025	<0.025	<0.025	< 0.025	< 0.025
WW-AA	6/23/2011	Asphalt	< 0.025	<0.050	<0.025	<0.025	<0.025	< 0.025	< 0.025
WW-AB	6/23/2011	Concrete	<0.025	<0.050	<0.025	<0.025	<0.025	< 0.025	<0.025
WW-AC	6/23/2011	Asphalt	<0.025	<0.050	<0.025	<0.025	<0.025	< 0.025	< 0.025
WW-AD	6/23/2011	Asphalt	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	< 0.025
WW-AE	6/23/2011	Asphalt	<0.025	<0.050	<0.025	<0.025	< 0.025	0.111	<0.025
WW-AF	6/23/2011	Concrete	<0.025	<0.050	<0.025	<0.025	<0.025	<0.023	<0.025
WW-AG	6/23/2011	Concrete	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
WW-AH	6/23/2011	Concrete	<0.025	<0.050	<0.025	<0.025	<0.025	< 0.025	<0.025
WW-AI	6/23/2011	Concrete	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	0,658
WW-AJ	6/23/2011	Concrete	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
WW-AK	6/23/2011	Concrete	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
WW-AL	6/23/2011	Concrete	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
WW-AM	6/23/2011	Concrete	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
WW-AN	6/23/2011	Asphalt	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
WW-AO	6/23/2011	Asphalt	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
WW-AP	6/23/2011	Asphalt	<0.025 <0.025	<0.050 <0.050	<0.025 <0.025	<0.025 <0.025	<0.025 <0.025	<0.025 <0.025	<0.025 <0.025
WW-AQ	6/23/2011	Asphalt		<0.050	<0.025 <0.025	<0.025	<0.025	<0.025	0.025
WW-AR	6/23/2011	Asphalt	<0.025	<0.050	40.025	Q.025	\$0,025	₹0.025	0.191

TABLE 1 PCBs in Porous Material - Wastewater Treatment Plant Sunkist - Former Citrus Processing Plant Ontario, CA

Seenole	· 在多種標準計劃	Maserial Description	9579 S	Street,	6.6		4.80		
Identification	Sample Date	Material Description	Areclar 1016	Amelor 1221	Araclor 1250	Araclar 1242	Arocke 128	Arocler 1254	Articlor 1260
WW-AS	6/23/2011	Concrete	<0.025	<0.050	<0.025	<0.025	<0.025	< 0.025	< 0.025
WW-AT	6/23/2011	Concrete	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
WW-AU	6/23/2011	Concrete	< 0.025	<0.050	<0.025	<0.025	< 0.025	0.086	<0.025
WW-AV	6/23/2011	Asphalt	< 0.025	<0.050	<0.025	< 0.025	< 0.025	< 0.025	<0.025
WW-AW	6/23/2011	Concrete	<0.025	< 0.050	<0.025	<0.025	< 0.025	<0.025	<0.025
WW-AX	6/23/2011	Concrete	<0.025	<0.050	<0.025	<0.025	<0.025	< 0.025	<0.025
WW-AY	6/23/2011	Asphalt	< 0.025	<0.050	<0.025	<0.025	< 0.025	< 0.025	<0.025
WW-AZ	6/23/2011	Concrete	< 0.025	<0.050	<0.025	<0.025	< 0.025	0.09	<0.025
WW-BA	6/23/2011	Asphalt	< 0.025	<0.050	<0.025	< 0.025	< 0.025	< 0.025	< 0.025
WW-BB.	6/23/2011	Asphalt	<0.025	<0.050	<0.025	<0.025	< 0.025	0.156	<0.025
WW-BC	6/23/2011	Asphalt	<0.025	<0.050	< 0.025	< 0.025	< 0.025	0.445	< 0.025
WW-BD	6/23/2011	Asphalt	<0.025	<0.050	<0.025	< 0.025	<0.025	0.0824	< 0.025
WW-BE	6/23/2011	Asphalt	<0.025	< 0.050	<0.025	<0.025	< 0.025	< 0.025	< 0.025
WW-BF	6/23/2011	Asphalt	<0.025	< 0.050	<0.025	<0.025	< 0.025	0.0847	< 0.025

Results given in milligrams per kilogram (mg/kg).
< = Not detected at or above the listed reporting limit.

Attachment A

Laboratory Report – ABC Environmental Laboratories

Mr. Brett Bowyer Bowyer Environmental 16458 Balsa Chica St., #422 HB, CA 92649 6/29/2011

Project:

Sunkist

Project Site:

Sunkist

Sample Date:

6/23/2011

Lab Job No.:

B11F025

Dear Mr. Bowyer,

Enclosed please find the analytical report for the samples received by ABC Environmental Laboratories on 6/23/11 and analyzed by the following EPA methods:

EPA 8082(PCBs)

All analyses have met the QA/QC criteria of this laboratory.

The sample(s) arrived in good conditions (i.e., chilled, intact) and with a chain of custoday record attached.

ABC Environmental Laboratories is certified by the CA DHS (Certificate No.2584). Thank you for giving us the opportunity to serve you.

Please feel free to call me at (909)923-8628 if our laboratory can be of further service to you.

Respectfully,

ABC Environmental Laboratories, Inc.

Ken Zheng, M.S.

Laboratory Director

This cover letter is an integral part of this analytical report.

Tel: (909)923-8628 (562)413-8343

Client: Bowyer Environmental Lab Job No.: B11F025

Project: Sunkist Date Sampled: 6/23/2011

Project Site: Sunkist, Ontario Date Received: 6/23/2011

Matrix: Soild(Black Grout Between Concrete Slabs) Date Extracted: 6/25/2011

Extraction Method: EPA 3580* Date Analyzed: 6/26/2011

Batch No.: 0626-PCB-S1 Date Reported: 6/29/2011

EPA 8082 (PCBs)

Reporting Unit: μg/kg (ppb)

			1				
DILUTION FACTOR		1	30	40	30	50	50
LAB SAMPLE I.D.		Method	B11F025-1	B11F025-2	B11F025-3	B11F025-4	B11F025-5
CLIENT SAMPLE I.I).	Blank	WW-B	WW-C	WW-D	WW-E	WW-F
COMPOUND	RL						
PCB-1016	25	ND	ND	ND	ND	ND	ND
PCB-1221	50	ND	ND	ND	ND	ND	ND
PCB-1232	25	ND	ND	ND	ND	ND	ND
PCB-1242	25	ND	ND	ND	ND	ND	ND
PCB-1248	25	ND	ND	ND	ND	ND	ND
PCB-1254	25	ND	1200	4440	1280	3650	ND
PCB-1260	25	ND	ND	ND	ND	ND	66600
Surrogate Recovery (%	QC Limi	65-140					
2,4,5,6-Tetrachloro-m-	cylene	82	. 101	101	113	105	90
Decachlorobiphenyl		90	126	103	109	96	107

RL=Reporting Limit; ND=Not Detected (Below RL x Dilution Factor).

Tel: (909)923-8628 (562)413-8343

^{*:} EPA extraction method 3580 was used as appropriate base on the nature of the sample media (Non-aqueous Solvent Soluble Materials).

Client: **Bowyer Environmental** Lab Job No.: B11F025 Project: Sunkist Date Sampled: 6/23/2011 Project Site: Sunkist, Ontario Date Received: 6/23/2011 Matrix: Soild(Black Grout Between Concrete Slabs) Date Extracted: 6/25/2011 **Extraction Method:** EPA 3580* Date Analyzed: 6/26/2011 Batch No.: 0626-PCB-S1 Date Reported: 6/29/2011

EPA 8082 (PCBs)

Reporting Unit: μg/kg (ppb)

DILUTION FACTOR		50	50	25	50	50
LAB SAMPLE I.D.		B11F025-6	B11F025-7	B11F025-8	B11F025-9	B11F025-10
CLIENT SAMPLE I.D.		WW-G	WW-H	WW-I	WW-J	WW-K
COMPOUND	RL					
PCB-1016	25	ND	ND	ND	ND	ND
PCB-1221	50	ND	ND	ND	ND	ND
PCB-1232	25	ND	ND	ND	ND	ND
PCB-1242	25	ND	ND	ND	ND	ND
PCB-1248	25	ND	ND	ND	ND	ND
PCB-1254	25	3720	1750	1310	1290	4170
PCB-1260	25	ND	ND	ND	ND	ND
Surrogate Recovery (%)	QC Limit:	65-140				
2,4,5,6-Tetrachloro-m-xy	lene	94	118	106	96	106
Decachlorobiphenyl		99	120	116	114	124

RL=Reporting Limit; ND=Not Detected (Below RL x Dilution Factor).

Tel: (909)923-8628 (562)413-8343

^{*:} EPA extraction method 3580 was used as appropriate base on the nature of the sample media (Non-aqueous Solvent Soluble Materials).

Lab Job No.: B11F025 Client: Bowyer Environmental Date Sampled: 6/23/2011 Project: Sunkist Project Site: Sunkist, Ontario Date Received: 6/23/2011 6/25/2011 Date Extracted: Matrix: Soild(Black Grout Between Concrete Slabs) Date Analyzed: 6/26/2011 EPA 3580* **Extraction Method:** Date Reported: 6/29/2011 Batch No.: 0626-PCB-S1

EPA 8082 (PCBs)

Reporting Unit: μg/kg (ppb)

DILUTION FACTOR		30	40	30	50	50		
LAB SAMPLE I.D.		B11F025-11	B11F025-12	B11F025-13	B11F025-14	B11F025-15		
CLIENT SAMPLE I.D.		WW-L	WW-M	WW-N	ww-o	WW-P		
COMPOUND	RL							
PCB-1016	25	ND	ND	ND	ND	ND		
PCB-1221	50	ND	ND	ND	ND	ND		
PCB-1232	25	ND	ND	ND	ND	ND		
PCB-1242	25	ND	ND	ND	ND	ND		
PCB-1248	25	ND	ND	ND	ND	ND		
PCB-1254	25	863	1230	1900	1340	2378		
PCB-1260	25	ND	ND	ND	ND	ND		
Surrogate Recovery (%) QC Limit: 65-140								
2,4,5,6-Tetrachloro-m-xy	lene	98	103	102	113	110		
Decachlorobiphenyl		118	130	120	128	127		

RL=Reporting Limit; ND=Not Detected (Below RL x Dilution Factor).

Tel: (909)923-8628

(562)413-8343

^{*:} EPA extraction method 3580 was used as appropriate base on the nature of the sample media (Non-aqueous Solvent Soluble Materials).

Client: Bowyer Environmental Lab Job No.: B11F025 Project: Sunkist Date Sampled: 6/23/2011 Project Site: Sunkist, Ontario Date Received: 6/23/2011 Soild(Black Grout Between Concrete Slabs) Date Extracted: Matrix: 6/25/2011 Extraction Method: EPA 3580* Date Analyzed: 6/26/2011 Batch No .: 0626-PCB-S1 Date Reported: 6/29/2011

EPA 8082 (PCBs)

Reporting Unit: µg/kg (ppb)

DILUTION FACTOR		35	50	50	50	50
LAB SAMPLE I.D.		B11F025-16	B11F025-17	B11F025-18	B11F025-19	B11F025-20
CLIENT SAMPLE I.D.		ww-q	WW-R	ww-s	WW-T	WW-U
COMPOUND	RL					
PCB-1016	25	ND	ND	ND	ND	ND
PCB-1221	50	ND	ND	ND	ND	ND
PCB-1232	25	ND	ND	ND	ND -	ND
PCB-1242	25	ND	ND	ND	ND	ND
PCB-1248	25	ND	ND	ND	ND	ND
PCB-1254	25	ND	ND	ND	ND	ND
PCB-1260	25	4320	8600	2440	6680	2300
Surrogate Recovery (%)	QC Limit:	65-140				
2,4,5,6-Tetrachloro-m-xyle	ene	70	100	90	74	129
Decachlorobiphenyl		82	120	112	84	131

RL=Reporting Limit; ND=Not Detected (Below RL x Dilution Factor).

Tel: (909)923-8628 (562)413-8343

^{*:} EPA extraction method 3580 was used as appropriate base on the nature of the sample media (Non-aqueous Solvent Soluble Materials).

Client: Bowyer Environmental Lab Job No.: B11F025

Project: Sunkist Date Sampled: 6/23/2011

Project Site: Sunkist, Ontario Date Received: 6/23/2011

Matrix: Solid Date Extracted: 6/24/2011

Extraction Method: EPA 3550B Date Analyzed: 6/25/2011

Batch No.: 0625-PCB-S1 Date Reported: 6/29/2011

EPA 8082 (PCBs)

Reporting Unit: μg/kg (ppb)

DILUTION FACTOR		1	1	1	2	2
LAB SAMPLE I.D.		Method	B11F025-21	B11F025-22	B11F025-23	B11F025-24
CLIENT SAMPLE I.D.		Blank	WW-V	ww-w	WW-X	WW-Y
COMPOUND	RL					
PCB-1016	25	ND	ND	ND	ND	ND
PCB-1221	50	ND	ND	ND	ND	ND
PCB-1232	25	ND	ND	ND	ND	ND
PCB-1242	25	ND	ND	ND	ND	ND
PCB-1248	25	ND	ND	ND	ND	ND
PCB-1254	25	ND	ND	ND	386	1020
PCB-1260	25	ND	ND	ND	ND	ND
Surrogate Recovery (%)	QC Limit:	65-140				
2,4,5,6-Tetrachloro-m-xyl	ene	85	72	68	75	78
Decachlorobiphenyl		89	77	94	86	99

RL=Reporting Limit; ND=Not Detected (Below RL x Dilution Factor).

Tel: (909)923-8628

(562)413-8343

Client:

Bowyer Environmental

Lab Job No.:

B11F025

Project:

Sunkist

Date Sampled:

6/23/2011

Project Site:

Sunkist, Ontario

Date Received:

6/23/2011

Matrix:

Solid

Date Extracted:

6/24/2011

Extraction Method:

EPA 3550B

Date Analyzed:

6/25/2011

Batch No.:

0625-PCB-S1

Date Reported:

6/29/2011

EPA 8082 (PCBs)

Reporting Unit: µg/kg (ppb)

DILUTION FACTOR		1	1	1	1	1
LAB SAMPLE I.D.		B11F025-25	25 B11F025-26 B11F025-27 B11F025-28		B11F025-28	B11F025-29
CLIENT SAMPLE I.D.		WW-Z	WW-AA	WW-AB	WW-AC	WW-AD
COMPOUND	RL					
PCB-1016	25	ND	ND	ND	ND	ND
PCB-1221	50	ND	ND	ND	ND	ND
PCB-1232	25	ND	ND	ND	ND	ND
PCB-1242	25	ND	ND	ND	ND	ND
PCB-1248	25	ND	ND	ND	ND	ND
PCB-1254	25	ND	ND	ND	ND	ND
PCB-1260	25	ND	ND	ND	ND	ND
Surrogate Recovery (%)	QC Limit:	65-140				
2,4,5,6-Tetrachloro-m-xylene		80	94	78	79	86
Decachlorobiphenyl	107	104	101	111	120	

RL=Reporting Limit; ND=Not Detected (Below RL x Dilution Factor).

Tel: (909)923-8628

(562)413-8343

1640 S. Grove Ave., Suite B Ontario, CA 91761

Client: Bowyer Environmental Lab Job No.: B11F025

Project: Sunkist Date Sampled: 6/23/2011

Project Site: Sunkist, Ontario Date Received: 6/23/2011

Matrix: Solid Date Extracted: 6/24/2011

Extraction Method: EPA 3550B Date Analyzed: 6/25/2011

6/29/2011 Batch No.: 0625-PCB-S1 Date Reported:

EPA 8082 (PCBs)

Reporting Unit: μg/kg (ppb)

DILUTION FACTOR		1	1	1	1	1
LAB SAMPLE I.D.		B11F025-30	B11F025-31	B11F025-32	B11F025-33	B11F025-34
CLIENT SAMPLE I.D.		WW-AE	WW-AF	WW-AG	WW-AH	WW-AI
COMPOUND	RL					
PCB-1016	25	ND	ND	ND	ND	ND
PCB-1221	50	ND	ND	ND	ND	ND
PCB-1232	25	ND	ND	ND	ND	ND
PCB-1242	25	ND	ND	· ND	ND	ND
PCB-1248	25	ND	ND	ND	ND	ND
PCB-1254	25	111	ND	ND	ND	ND
PCB-1260	25	ND	ND .	ND	ND	658
Surrogate Recovery (%)	QC Limit	65-140				
2,4,5,6-Tetrachloro-m-xy	lene	94	87	95	94	84
Decachlorobiphenyl		122	104	110	119	108

RL-Reporting Limit; ND=Not Detected (Below RL x Dilution Factor).

Tel: (909)923-8628

(562)413-8343

Client:

Bowyer Environmental

Lab Job No.:

B11F025

Project:

Sunkist

Date Sampled:

6/23/2011

Project Site:

Sunkist, Ontario

Date Received:

6/23/2011

Matrix:

Solid

Date Extracted:

6/24/2011

Extraction Method:

EPA 3550B

Date Analyzed:

6/25/2011

Batch No.:

0625-PCB-S1

Date Reported:

6/29/2011

EPA 8082 (PCBs)

Reporting Unit: µg/kg (ppb)

			FB E (II						
DILUTION FACTOR		1	l	1	1	1			
LAB SAMPLE I.D.		B11F025-35	B11F025-36	B11F025-37	B11F025-38	B11F025-39			
CLIENT SAMPLE I.I).	WW-AJ	WW-AK	WW-AL	WW-AM	WW-AN			
COMPOUND	RL								
PCB-1016	25	ND	ND	ND	ND	ND			
PCB-1221	50	ND	ND	ND	ND	ND			
PCB-1232	25	ND	ND	ND	ND	ND			
PCB-1242	25	ND	ND	ND	ND	ND			
PCB-1248	25	ND	ND	ND	ND	ND			
PCB-1254	25	ND	ND	ND	ND	ND			
PCB-1260	25	ND	ND	ND	ND	ND			
Surrogate Recovery (%	Surrogate Recovery (% QC Limit: 65-140								
2,4,5,6-Tetrachloro-m-xylene		90	96	95	87	80			
Decachlorobiphenyl		108	124	112	106	106			

RL=Reporting Limit; ND=Not Detected (Below RL x Dilution Factor).

Tel: (909)923-8628

(562)413-8343 Fnx: (909)923-8628

Client: Bowyer Environmental Lab Jo

Lab Job No.:

B11F025

Project:

Sunkist

Date Sampled:

6/23/2011

Project Site:

Sunkist, Ontario

Date Received:

6/23/2011

Matrix:

Solid

Date Extracted:

6/24/2011

Extraction Method:

EPA 3550B

Date Analyzed:

6/26/2011

Batch No.:

0626-PCB-S2

Date Reported:

6/29/2011

EPA 8082 (PCBs)

Reporting Unit: µg/kg (ppb)

			g chin pgrig (
DILUTION FACTOR		1	1	1	1	1
LAB SAMPLE I.D.		Method	B11F025-40	B11F025-41	B11F025-42	B11F025-43
CLIENT SAMPLE I.D.		Blank	WW-AO	WW-AP	WW-AQ	WW-AR
COMPOUND	RL			-		
PCB-1016	- 25	ND	ND	ND	ND	ND
PCB-1221	50	ND	ND	ND	ND	ND
PCB-1232	25	ND	ND	ND	ND	ND
PCB-1242	25	ND	ND	ND	ND	ND
PCB-1248	25	ND	ND	ND	ND	ND
PCB-1254	25	ND	ND	ND	ND	191
PCB-1260	25	ND	ND	ND	ND	ND
Surrogate Recovery (%)	QC Limit:	65-140	65-140			
2,4,5,6-Tetrachloro-m-xylene		123	94	88	106_	107
Decachlorobiphenyl		135	93	108	120	116

RL=Reporting Limit; ND=Not Detected (Below RL x Dilution Factor).

Tel: (909)923-8628 (562)413-8343

Client:

Bowyer Environmental

Lab Job No.:

B11F025

Project:

Sunkist

Date Sampled:

6/23/2011

Project Site:

Sunkist, Ontario

Date Received:

6/23/2011

Matrix:

Solid

Date Extracted:

6/24/2011

Extraction Method:

EPA 3550B

Date Analyzed:

6/26/2011

Batch No .:

0626-PCB-S2

Date Reported:

6/29/2011

EPA 8082 (PCBs)

Reporting Unit: µg/kg (ppb)

DILUTION FACTOR		1	1	1	l	1
LAB SAMPLE I.D.		B11F025-44	B11F025-45	B11F025-46	B11F025-47	B11F025-48
CLIENT SAMPLE I.D		WW-AS	WW-AT	WW-AU	WW-AV	WW-AW
COMPOUND	RL					
PCB-1016	25	ND	ND	ND	ND	ND
PCB-1221	50	ND	ND	ND	ND	ND
PCB-1232	25	ND	ND	ND	ND	ND
PCB-1242	25	ND	ND	ND	ND	ND
PCB-1248	25	ND	ND	ND	ND	ND
PCB-1254	25	ND	ND	86	ND	ND
PCB-1260	25	ND	ND	ND	ND	ND
Surrogate Recovery (%)	QC Limit:	65-140				
2,4,5,6-Tetrachloro-m-xylene		92	110	109	119	109
Decachlorobiphenyl		112	130	120	125	130

RL=Reporting Limit; ND=Not Detected (Below RL x Dilution Factor).

Tel: (909)923-8628

(562)413-8343 Fax: (909)923-8628

Client:

Bowyer Environmental

Lab Job No.:

B11F025

Project:

Sunkist

Date Sampled:

6/23/2011

Project Site:

Sunkist, Ontario

Date Received:

6/23/2011

Matrix:

Solid

Date Extracted:

6/24/2011

Extraction Method:

EPA 3550B

Date Analyzed:

6/26/2011

Batch No.:

0626-PCB-S2

Date Reported:

6/29/2011

EPA 8082 (PCBs)

Reporting Unit: µg/kg (ppb)

DILUTION FACTOR		1	1	1	1	1	
LAB SAMPLE I.D.		B11F025-49	B11F025-50	B11F025-51	B11F025-52	B11F025-53	
CLIENT SAMPLE I.D.		WW-AX	WW-AY	WW-AZ	WW-BA	WW-BB	
COMPOUND	RL						
PCB-1016	25	ND	ND	ND	ND	ND	
PCB-1221	50	ND	ND	ND	ND	ND	
PCB-1232	25	ND	ND	ND	ND	ND	
PCB-1242	25	ND	ND	ND	ND	ND	
PCB-1248	25	ND	ND	ND	ND	ND	
PCB-1254	25	ND	ND	90	ND	156	
PCB-1260	25	ND	ND	ND	ND	ND	
Surrogate Recovery (%) QC Limit: 65-140							
2,4,5,6-Tetrachloro-m-xy	101	89	79	88	86		
Decachlorobiphenyl		125	100	97	105	101	

RL=Reporting Limit; ND=Not Detected (Below RL x Dilution Factor).

Tel: (909)923-8628

(562)413-8343

1640 S. Grove Ave., Suite B Ontario, CA 91761

Client:

Bowyer Environmental

Lab Job No.:

B11F025

Project:

Sunkist

Date Sampled:

6/23/2011

Project Site:

Sunkist, Ontario

Date Received:

6/23/2011

Matrix:

Solid

Date Extracted:

6/24/2011

Extraction Method: EPA 3550B

Date Analyzed: Date Reported:

6/26/2011 6/29/2011

Batch No.:

0626-PCB-S2

EPA 8082 (PCBs)

Reporting Unit: µg/kg (ppb)

DILUTION FACTOR		1	1	1	1	1			
LAB SAMPLE I.D.		B11F025-54	B11F025-55	B11F025-56	B11F025-57	B11F025-58			
CLIENT SAMPLE I.I	D	WW-BC	WW-BD	WW-BE	WW-BF	WW-AOC2-A			
COMPOUND	RL								
PCB-1016	25_	ND	ND	ND	ND	ND			
PCB-1221	50	ND	ND	ND	ND	ND			
PCB-1232	25	ND	ND	ND	ND	ND			
PCB-1242	25	ND	ND	ND	ND	ND			
PCB-1248	25	ND	ND	ND	ND	ND			
PCB-1254	25	445	82.4	ND	84.7	278			
PCB-1260	25	ND	ND	ND	ND	ND			
Surrogate Recovery (%	Surrogate Recovery (% QC Limit: 65-140								
2,4,5,6-Tetrachloro-m-xylene		95	105	82	88	88			
Decachlorobiphenyl		98	112	86	86	71			

RL=Reporting Limit; ND=Not Detected (Below RL x Dilution Factor).

Tel: (909)923-8628 (562)413-8343

Client: Bowyer Environmental Lab Job No.:

Project: Sunkist Date Sampled: 6/23/2011

Project Site: Sunkist, Ontario Date Received: 6/23/2011

Matrix: Solid Date Extracted: 6/24/2011

Extraction Method: EPA 3550B Date Analyzed: 6/25/2011

Batch No.: 0625-PCB-S2 Date Reported: 6/29/2011

EPA 8082 (PCBs)

Reporting Unit: µg/kg (ppb)

			String ome pg ng	V				
DILUTION FACTOR		1	1	11	2	2		
LAB SAMPLE I.D.		Method	B11F025-59	B11F025-60	B11F025-61	B11F025-62		
CLIENT SAMPLE I.D	•	Blank	WW-AOC2-B	WW-AOC2-C	WW-AOCI-A	WW-AOCI-B		
COMPOUND	RL		•					
PCB-1016	25	ND	ND	ND	ND	ND		
PCB-1221	50	ND	ND	ND	ND	ND		
PCB-1232	25	ND	ND	ND	ND	ND		
PCB-1242	25	ND	ND	ND	ND	ND		
PCB-1248	25	ND	ND	ND	ND	ND		
PCB-1254	25	ND	235	193	270	478		
PCB-1260	25	ND	ND	ND	ND	ND		
Surrogate Recovery (%) QC Limit 65-140								
2,4,5,6-Tetrachloro-m-xy	78	94	96	92	88			
Decachlorobiphenyl		78	86	96	96	91		

RL=Reporting Limit; ND=Not Detected (Below RL x Dilution Factor).

Tel: (909)923-8628 (562)413-8343

B11F025

Client:

Bowyer Environmental

Lab Job No.:

B11F025

Project:

Sunkist

Date Sampled:

6/23/2011

Project Site:

Sunkist, Ontario

Date Received:

6/23/2011

Matrix:

Solid

Date Extracted:

6/24/2011

Extraction Method:

EPA 3550B

Date Analyzed:

6/26/2011

Batch No .:

0626-PCB-S2

Date Reported:

6/29/2011

EPA 8082 (PCBs)

Reporting Unit: µg/kg (ppb)

			g om payag (pp		
DILUTION FACTOR		l	1	 	
LAB SAMPLE I.D.		B11F025-63	B11F025-64		
CLIENT SAMPLE I.D.		WW-AOCI-C	WW-AOCI-D	 	
COMPOUND	RL				
PCB-1016	25	ND	ND		
PCB-1221	50	ND	ND		
PCB-1232	25	ND	ND		
PCB-1242	25	ND	ND		
PCB-1248	25	ND	ND		
PCB-1254	25	38.4	42.9		
PCB-1260	25	ND	ND		
Surrogate Recovery (%)	QC Limi	65-140			
2,4,5,6-Tetrachloro-m-xy	lene	101	98		
Decachlorobiphenyl		92	92		

RL=Reporting Limit; ND=Not Detected (Below RL x Dilution Factor).

Tel: (909)923-8628 (562)413-8343

EPA 8082 (PCBs) Batch QA/QC Report

Client:

Bowyer Environmental

Lab Job No.:

B10L060

Project:

Sunkist

Lab Sample ID:

LCS

Matrix:

Soil

Date Analyzed:

6/26/2011

Batch No.:

0626-PCB-S1

Date Reported:

6/29/2011

MB/LCS/LCSD Report

Unit: ug/kg

				Onit. ug/	<u>e</u>				
Analyte	Method	Spike	LCS	LCSD	LCS	LCSD	%RPD	%RPD	%Rec.
	Blank	Conc.			%Rec.	%Rec.		Accept	Accept
								Limit	Limit
PCB-1254	ND	500	543	556	109	111	2	≤30	75-130
Surrogate Reco	overy (%)								
2,4,5,6-TCMX	82				80	78			65-140
DCP	90				75	69			65-140

ND: Not Detected (Below RL).

Tel: (909)923-8628 (562)413-8343

EPA 8082 (PCBs) Batch QA/QC Report

Client:

Bowyer Environmental

Lab Job No.:

B11F025

Project:

Sunkist

Lab Sample ID:

B11F025-21

Matrix:

Solid

Date Analyzed:

6/25/2011

Batch No.:

0625-PCB-S1

Date Reported:

6/29/2011

I. MS/MSD Report

Unit: ug/kg

				Olitt. ug/					
Analyte	Sample	Spike	MS	MSD	MS	MSD	%RPD	%RPD	%Rec.
	Conc.	Conc.			%Rec.	%Rec.		Accept	Accept
								Limit	Limit
PCB-1254	ND	500	497	552	99	110	10	≤30	75-135
Surrogate Recov	ery (%)								
2,4,5,6-TCMX	72				68	72			65-140
DCP	77				81	91			65-140

II. MB/LCS Report

Unit: ug/kg

Analyte	Method	Report	True	Rec.%	Accept
	Blank	Value	Value		Limit
PCB-1254	ND	502	500	100	70-130
Surrogate Recov	/ery (%)				
2,4,5,6-TCMX	85	74		91	65-140
DCP	89	69		86	65-140

ND: Not Detected (Below RL).

MB: Method Blank.

Tel: (909)923-8628 (562)413-8343

EPA 8082 (PCBs) Batch QA/QC Report

Client:

Bowyer Environmental

Lab Job No.:

B11F025

Project:

Sunkist

Lab Sample ID:

B11F025-52

Matrix:

Solid

Date Analyzed:

6/25/2011

Batch No .:

0625-PCB-S2

Date Reported:

6/29/2011

I. MS/MSD Report

Unit: ug/kg

				Omt. ug/	<u>~E</u>				
Analyte	Sample	Spike	MS	MSD	MS	MSD	%RPD	%RPD	%Rec.
	Conc.	Conc.			%Rec.	%Rec.		Accept	Accept
								Limit	Limit
PCB-1254	ND	500	540	594	108	119	10	≤30	75-135
Surrogate Reco	very (%)								
2,4,5,6-TCMX	119				84	80			65-140
DCP	125				98	79			65-140

II. MB/LCS Report

Unit: ug/kg

Analyte	Method	Report	True	Rec.%	Accept
	Blank	Value	Value		Limit
PCB-1254	ND	545	500	109	70-130
Surrogate Recov	very (%)				
2,4,5,6-TCMX	123	72			65-140
DCP	135	89			65-140

ND: Not Detected (Below RL).

MB: Method Blank.

Tel: (909)923-8628 (562)413-8343

EPA 8082 (PCBs) Batch QA/QC Report

Client:

Bowyer Environmental

Lab Job No.:

B11F025

Project:

Sunkist

Lab Sample ID:

LCS

Matrix:

Solid

Date Analyzed:

6/26/2011

Batch No .:

0626-PCB-S2

Date Reported:

6/29/2011

MB/LCS/LCSD Report

Unit: ug/kg

Analyte	Method	Spike	LCS	LCSD	LCS	LCSD	%RPD	%RPD	%Rec.
	Blank	Conc.			%Rec.	%Rec.		Accept	Accept
								Limit	Limit
PCB-1254	ND	500	589	461	118	92	24	≤30	75-130
Surrogate Recov	ery (%)								
2,4,5,6-TCMX	123				80	79			65-140
DCP	135				82	97			65-140

ND: Not Detected (Below RL).

MB: Method Blank.

Tel: (909)923-8628 (562)413-8343

Matrix Code:

DW-Drinking Water

GW=Ground Water

WW=Waste Water

SD=Solid Waste

SL=Sludge

AR=Air

SS=Soil/Sediment

PP=Pure Product

Preservative Code

IC=Ice

HC...HCI

HN=HNO3

_		En	viro	nm	ental		164	40B :	S. Gr	ove A	, ve., C	Ontai	rio, C	CA 9	176°	1						Pa	age	1	L	of	5
AB	C	La			ies, Ind	-	Tel Tel	: 562 / Fax	2-413 c: 909	-8343 9-923-	8628	C	H/	M	1	OF	C	US	T	OI	YC	La	ab Jo	ob N	lumbe	er <u></u>	BIIF02
Client Name	EC							1 3	ample onditi	Hece	pt		······································			F	۱na	iys	es	Rec	ue	ste	d		, ,		Turn Around Time Requested
Address Toll Be Report Attention DVe+1	Phone Fax: #	BLV1 #877	D 5 237-	562 462	te to	O oled B	, ,	_		Chilled		Oxygenates	Oxygenates)	& MTBE)	EPA8015M / 8015B (Gasoline)	(Diesel)	EPA8081A (Organochlorine Pesticides)			ר Chain)	(-	*			☐ Rush 8 12 24 48 Hours
Project No./ Name	Project	Site Scu	akis	t 8	Intar				_ s	ample	Seal	(VOCs 8	3TEX &	втех (8015B	/ 8015B	Organocí	CBs)	rrph)	(Carbor	(Metals	tals					I Normal
Client Sample ID	L	ab ple ID		ole C	Collection Time			San Pres	nple erve	No., t & siz conta	ype* e of ainer	EPA8260B	EPA8260B(BTEX &	EPA8021B (BTEX	EPA8015M	EPA8015M	EPA8081A	EPA 8082 (PCBs)	EPA418.1 (TRPH)	EPA8015M (Carbon	EPA 7000s (Metals)	CAM 17 Metals					Remarks
WW-B	ESII	Fors-1	6/23	14	8:40	Si	Ù	L	CE	1-								X									
WW-C		-2			8:45	1					_															_	
WW-D		-3			8:50																						
WW-E		-4			8:55													1									
WW-F		ナ			9:00			\sqcup										4								_	
MM-E		-6			4:03													4								_	
WW-H		~7			9:10			\perp										1									
WW-I		-8			9:11																						
MM-2	to We will make a material	-9			4:12																						
WW-K		70			4513																						
WW-L		-11			9:25													\perp	Ì								
M-MW		-12			9:26																						
WW-N		-13			9:35																						
WW-0		1-14			9:36				1		1																
WW-P	1	1-15	V		9:45	,	7	$ \overline{\psi}$	/	١	/							4									
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SH=NaOH

HS=H2SO4

ST=Na2S2O3

* Sample Container Types:

B= Brass Tube

V=VOA Vial

P=Plastic Bottle

E= EnCore

T=Tedlar Air Bag

ST Steel Tube

G=Glass Container

Environmental Laboratories, Inc.

1640B S. Grove Ave., Ontario, CA-91761

Tel: 562-413-8343

Tel/ Fax: 909-923-8628 CHAIN OF CUSTODY

Client Name	BE								mple nditio	Recei	pt					A	lna	lys	es l	Req	ues	stec	t				Turn Around Time Requested
Address 1701 Beac Report Attention Brett	Phone Fax: #	VD :	Sutto 232-	2 9 462	Samp Wi	oled E	Ϋ́P.			hilled		& Oxygenates)	& Oxygenates)	& MTBE)	EPA8015M / 8015B (Gasoline)	B (Diesel)	EPA8081A (Organochlorine Pesticides)			on Chain)	s)	•					☐ Rush 8 12 24 48 Hours
Project No./ Name	Project	Site	inki	3+	Ontas	10] S	ample	Seal	VOCS	ВТЕХ	(втех	/ 8015	/ 8015	Огдалох	PCBs)	ТВРН	(Carbo	(Metal	tais					,ENOITIAI
Client Sample ID	La		Samp Date		ollection Time	Ма Ту		Sam Prese		No., t & siz conta	e of	EPA8260B	EPA8260B(BTEX	EPA8021B (BTEX	EPA8015M	EPA8015M / 8015B (Diesel)	EPA8081A	EPA 8082 (PCBs)	EPA418.1 (TRPH)	EPA8015M (Carbon	EPA 7000s (Metals)	CAM 17 Metals			Ž.,,.		Remarks
WW-Q	ESIIF	02516	6/2	3/4	9:50	5	2	1e(1-	G							X									
WW-R	1	-17	1		9:57	400000000000000000000000000000000000000					,							1									
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WW-T		-19			(0'05																						
WW-u		-20			80,00																						,
WW-V		-21			11:28					·																	·
W-WW		-22			11:35																						
WW-X		-23			11:40																						
WW-Y		-24			11:45						\							_									
WW-Z		-N			11:50						<u> </u>																
WW AA		-26			11:55							,															
WW-AB		-27			17:00													1									
WW-AC		-28			17:10																						
WW-AD		-29			17:15				,		1/							\perp									
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Relinquished By	4 B	mpany EC ompany	6/2 Da		Time Time	И	J	eived E	<u> </u>	- A	mpany BCL mpany	ubs	6	ate <u>/23/</u> ate	1116	Tim ان د Tim	PA	No	ote:	Sam repo	ples rted	are d unles	iscaros oth	ded 3 er ar	80 day range	ys af emer	ter results are nts are made.

Matrix Code:

DW=Drinking Water GW=Ground Water WW=Waste Water SD=Solid Waste

SL=Sludge SS=Soil/Sediment AR=Air PP=Pure Product

Preservative Code

IC=Ice HC∞HCI HN=HNO3

SH=NaOH ST=NazS2O3 HS=H2SO4

* Sample Container Types: T=Tedlar Air Bag G=Glass Container ST= Steel Tube

+16.

B= Brass Tube P=Plastic Bottle V=VOA Vial

E= EnCore

Report Attention Phone # 7 Fax: # Project No./ Name Client Lab Sample ID Sample ID WW-AF ESTIFOZE WW-AF	BC	Env Lat			ental ies, Inc	C.	164 Tel Tel	10B 5 : 562 / Fax	S. Gr -413 : 90 9	ove Av -8343 9-923-8	/e., O	ntar	io, C	CA-9	176) DF	C	U:	31	ΟĮ	YC	Pa La	nge . ib Jo	ob N	y umb	er 🕍	5 B1/F024
Project No./ Name Client Sample ID WW - AF ESTIFOZE WW - AG WW - AG WW - AT WW	ne BEC	· · · · · · · · · · · · · · · · · · ·						Sa	imple	Recei												ste		***************************************	,		Turn Around Time Requested
Project No./ Name Client Lab Sample ID Sample	tention Phone #				Tte 90 20 Sami		沙	-		ons Chilled		& Oxygenates)	EPA8260B(BTEX & Oxygenates)	. MTBE)	(Gasoline)	(Diesel)	EPA8081A (Organochiorine Pesticides)	***************************************		Chain)		,					☐ Rush 8 12 24 48 Hours
Client Sample ID Sample ID Sample ID Sample ID Sample ID Sample ID WW - AF ESIIF025 WW - AF ESIIF025 WW - AF ESIIF025 WW - AF - 3 WW - AF - 4 WW - AF - 4	Project S	Site Su	nk13	+ (Ontar	70			o s	ample	Seal	(VOCs &	TEX &	STEX 8	80158	8015B	irganochi	CBs)	RPH)	Carbon	Metals)	sje					Normal
W-AG W-AT W-AT W-AT W-AT W-AT W-AT W-AC W-CO	nt Lal	b [Samp Dat	ole C	Collection Time	Ма	I	Sam Pres	,	No., ty & siz conta	e of	EPA8260B (\	PA8260B(B	EPA8021B (BTEX & MTBE)	EPA8015M / 8015B (Gasoline)	EPA8015M / 8015B (Diesel)	PA8081A (C	EPA 8082 (PCBs)	EPA418.1 (TRPH)	EPA8015M (Carbon	EPA 7000s (Metals)	CAM 17 Metals			à.º		Remarks
W-AG W-AH -3 W-AJ -3 W-AJ -3 W-AL -3 W-AN -3 W-AN -3 W-AN -3 W-AN -4 W-AR -4	AF ESIF	025-3	6/2	3/11	12:20	S	5	10	E	1-	G	<u>u</u>			ш	"	LLJ.	X	w		·ui	J					
JW-AI -3 JW-AJ -3 JW-AK -3 JW-AM -3 JW-AN -3 JW-AN -3 JW-AO -9 JW-AO -9 JW-AQ -4 JW-AQ -4 JW-AR -9		-3z		7	12:25			1										T									
JW-AJ -3 JW-AK -3 JW-AM -3 JW-AN -3 JW-AN -3 JW-AO -9 JW-AP -9 JW-AQ -4 JW-AQ -4	+ H	-33			1:20]																			
JW-A K -3 JW-A L -3 JW-A M -3 JW-A N -3 JW-A O -9 JW-A O -9 JW-A Q -4 JW-A Q -4 JW-A R -9	11	-34			1:25													L									
JW-AL -3 JW-AM -3 JW-AN -3 JW-AO -9 JW-AP -9 JW-AQ -4 JW-AQ -4 JW-AQ -4	+J .	-35			1:30																						
JW-AM -3 JW-AN -3 JW-AO -9 JW-AP -9 JW-AQ -4 JW-AR -9	- K	-36			1:50													L									•
JW-AN -3 JW-AO -9 JW-AP -4 JW-AQ -4 JW-AR -4	f []	-37	$\perp \! \! \! \! \! \perp$		7:00																						
JW-AN -3 JW-AO -9 JW-AP -9 JW-AQ -4 JW-AR -4	4 M	-38			2:05																						
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1W-AQ -4 W-AR -4	40	-00			2:20																						
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	AQ	-42			2:30	-													٠.								
	4 R	-43			2:35																						
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Matrix Code:

DW=Drinking Water GW=Ground Water WW=Waste Water SD=Solid Waste

SL=Sludge SS=Soil/Sediment AR=Air PP=Pure Product

Preservative Code

IC=lce HC=HCI HN=HNO3 SH=NaOH ST=Na₂S₂O₃ HS=H2SO4

Sample Container Types: T=Tedlar Air Bag G=Glass Container ST= Steel Tube

B= Brass Tube P=Plastic Bottle V=VOA Vial

E= EnCore

Environmental Laboratories, Inc.

۸D		Env	/iro	nme	ental		164 Tel	40B S	S. Gr -413	ove Av -8343	/e., O	ntar	io, C	A 9	1761	I						Pa	ige .	٤	1_	of	5
AB			oro	tor	ies, Inc	C.	Tel	/ Fax	909	-923-8	3628	C	HZ	11/	4(ob N	umb	er <u> </u>	B11F02
	BEC								imple anditio	Recei	pt	_			-	F	Ina	ys	es I	Req	lue	stec	: 				Turn Around ime Requested
Address (701) Report Attention	Bear Phone	ch B1	-535 ND	<u> </u>	zuite f	oled I	 }		o Ir	hilled		Oxygenates	Oxygenates)	MTBE)	8015B (Gasoline)	(Diesel)	yine Pesticides)			Chain)							☐ Rush 8 12 24 48 Hours
Project No./ Name	Projec	sis Su	-Jei	54 (Ortar	7			o s	ample	Seal	(VOCs &	TEX &	∞ŏ	8015B	8015B	Organochik	CBs)	RPH)	Carbon	Metals)	als	-				Normal
Client Sample ID	L	_ab nple ID	Sam _i Dat	ple C	ollection Time	Ma	ıtrix pe	Sam Pres	,	No., t & siz conta	e of	EPA8260B (EPA8260B(BTEX &	EPA8021B (BTEX	EPA8015M /	EPA8015M / 8015B (Diesel)	EPA8081A (Organochlorine	EPA 8082 (PCBs)	EPA418.1 (TRPH)	EPA8015M (Carbon	EPA 7000s (Metals)	CAM 17 Metals					Remarks
WWAU	ESI	1F0X-96	6/23	lu	3:00	2	5	I	Æ	1-	G							X									
LW-AV		-47			3:15																						
WA-AW		-48			3:70													\perp									
WW-XX		-49			3:25													\perp	<u> </u>							\perp	
WW-AY		-50			3:30							ļ	***************************************					4				ļ	<u> </u>				
WW-AZ		-51			3740														<u> </u>					ļ			until unit de la constante de
WW-BA		-12			3745		1_				***************************************	<u> </u>				<u> </u>		4	<u> </u>	ļ	_						
WW-BB WW-BC		-73			3:55		<u> </u>					<u> </u>						4	 		<u> </u>						,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
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Matrix Code:

DW=Drinking Water GW=Ground Water www.Waste Water SD=Solid Waste

SL=Sludge SS∞Soil/Sediment AR=Air PP∞Pure Product

Preservative Code

IC=lce HC::HCI HN=HNO₃ SH=NaOH ST=Na2S2O3 HS=H2SO4

* Sample Container Types: T=Tedlar Air Bag G=Glass Container ST ... Steel Tube

B= Brass Tube P=Plastic Bottle V=VOA Vial

E= EnCore

ABC

Environmental Laboratories, Inc.

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DW=Drinking Water GW=Ground Water WW=Waste Water SD=Solid Waste

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IC=Ice **HC**≔**HC**I cont=nH SH=NaOH ST=Na2S2O3 HS=H2SO4

* Sample Container Types: T=Tedlar Air Bag G=Glass Container ST= Steel Tube

B= Brass Tube P=Plastic Bottle V=VOA Vial

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION IX

75 Hawthorne Street San Francisco, CA 94105

Via Electronic Mail and U.S. Postal Service Mail

August 19, 2011

Mr. Keith Rudd Sunkist Growers, Inc. Director of Environmental and Technology 531 West Popular Avenue Tipton, CA 93272

Re: Polychlorinated Biphenyls (PCBs), Toxic Substances Control Act (40 CFR 761.61(c)) – USEPA Conditional Approval of "Remedial Action Plan," Former Sunkist Citrus Plant

Dear Mr. Rudd:

The U.S. Environmental Protection Agency Region 9 (USEPA) is approving with conditions the "Remedial Action Plan" (RAP) for the Former Sunkist Citrus Processing Plant at 616 East Sunkist Boulevard in Ontario, California (Sunkist Site) dated May 22, 2011 and prepared by BEC for Sunkist Growers, Inc. The RAP serves as the polychlorinated biphenyls (PCB) risk-based disposal approval application (Application) required in the Toxic Substances Control Act (TSCA) PCB regulations in 40 CFR 761.61(c). The Application is for the Sunkist PCB Cleanup Site (PCS) encompassed within the 11.11-acre Sunkist Site.

USEPA is approving the RAP (Application) under 40 CFR 761.61(c). Among other things, the Application involves additional characterization sampling for PCBs in soils and concrete, cleanup of PCB-contaminated soils via excavation if necessary, offsite disposal of PCB remediation waste (e.g., soils, concrete), and onsite use of concrete with PCB levels equal to or below 4.5 milligrams/kilograms (mg/kg). USEPA is approving a PCB cleanup level for soils and concrete at the Site equal to 4.5 mg/kg total PCBs which was developed by Sunkist / BEC via a site-specific health risk assessment.

We look forward to being of assistance during Sunkist / BEC's implementation of the approved PCB cleanup Application as modified by USEPA's conditions of approval. Please call Carmen D. Santos at 415.972.3360 if you have any questions concerning this conditional approval.

Sincer

Jeff Scott, Director

Waste Management Division

Keith Rudd

Re: USEPA Conditional Approval – TSCA PCB Cleanup Former Sunkist Citrus Processing Plant, Ontario, California

Date: August 19, 2011

Enclosures (2)

Cc: Steve Armann, USEPA R9 Carmen Santos, USEPA R9



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION IX 75 Hawthorne Street San Francisco, CA 94105

August 19, 2011

USEPA Conditional Approval for Former Sunkist Citrus Processing Plant 616 East Sunkist Boulevard Ontario, California TSCA PCB Cleanup Under 40 CFR 761.61(c)

A. Introduction

The U.S. Environmental Protection Agency Region 9 (USEPA) hereby approves with conditions the "Remedial Action Plan" (RAP) for the Former Sunkist Citrus Processing Plant, 616 East Sunkist Boulevard, Ontario, California, dated May 22, 2011 and prepared by Bowyer Environmental Consulting (BEC) for Sunkist Growers, Inc. (Sunkist). Sunkist has submitted the RAP under the Toxic Substances Control Act (TSCA) regulations for polychlorinated biphenyls (PCBs) in 40 CFR 761.61(c) (risk-based PCB cleanup). As such, the RAP is the risk-based disposal approval application required under that section of the TSCA regulations for the cleanup of PCBs. The RAP (Application) addresses additional characterization sampling and cleanup of PCBs at the Former Sunkist Plant in Ontario, California (Sunkist Site).

This approval is effective on the date of this enclosure. Section C below contains the conditions of approval.

Any party cleaning up PCBs from soils and structures must do so consistent with the requirements set forth at 40 CFR 761.61. The TSCA PCB regulations in 40 CFR 761.61 establish PCB cleanup options consisting of self-implementing (40 CFR 761.61(a)), performance-based (40 CFR 761.61(b)), or risk-based (40 CFR 761.61(c)) cleanup alternatives. Depending on site-specific factors, USEPA may approve and require implementation of a PCB cleanup following a hybrid approach that applies requirements from multiple cleanup options.

USEPA is approving the Application with conditions under the TSCA regulatory requirements for PCBs in 40 CFR 761.61(c) and 40 CFR 761.61(a).

- B. Former Sunkist Citrus Processing Plant, Sunkist PCB Cleanup Site, Land Use, Sources of PCB Contamination, and PCB Cleanup
- 1. Sunkist Site and Sunkist PCB Cleanup Site. The Sunkist Site consists of approximately 11.11 acres in the City of Ontario. The Sunkist PCB Cleanup Site (PCS) is located within the Sunkist Site.

Former Citrus Processing Plant, Ontario, California

Date: August 19, 2011

- 2. Current and future land use. According to the Application, the current land use at the Sunkist Site is industrial and the future land use is expected to be industrial. The Sunkist Site operated as a citrus processing plant from 1926 (operated by Sunkists' predecessor Ontario Citrus Exchange) and completed citrus processing operations in 2008. The onsite wastewater treatment plant is still operating at the Site
- 3. Sources of PCB Contamination. Among potential sources of contamination is hydraulic equipment that may have been lubricated with PCB-containing oils. PCB Aroclors 1254 and 1260 have been detected at the site in concrete and soils. In addition, based on a small number of soil samples, dioxin-like PCB congeners were detected at the Site.
- **4. PCB Cleanup.** Among other requirements, the conditions of approval for the PCB cleanup at the Sunkist Site require that Sunkist:
 - Submit additional information concerning further characterization of PCBs in concrete stockpiled in certain areas of the PCS and in building basements.
 - Conduct additional soil characterization.
 - Excavate and dispose offsite (consistent with 40 CFR 761.61(a)) soils, concrete, and asphalt contaminated with PCBs above the USEPA-approved PCB cleanup level of 4.5 mg / kg. This includes any soils contaminated with PCBs above the cleanup level that may be present beneath concrete or asphalt.
 - Conduct soil cleanup verification sampling and analysis in accordance with the required SAP (to be approved under 40 CFR 761.61(c)).
 - Verify compliance with the cleanup level via use of USEPA's ProUCL statistical program.
 - Dispose offsite other cleanup wastes in accordance with 40 CFR 761.61(a).
 - Use onsite concrete that is contaminated with PCBs below the cleanup level.
 - Submit for USEPA approval a PCB Cleanup Completion Report.
 - Restrictive covenant recorded in accordance with state law that among other information documents the onsite use of concrete with PCBs below the PCB cleanup level of 4.5 mg/kg.

C. USEPA's Conditions of Approval

This conditional approval does not relieve the owner and the cleanup party from complying with all other applicable federal, state, and local regulations and permits. Sunkist and BEC must comply with the specified PCB cleanup requirements in 40 CFR 761.61(c), PCB remediation waste disposal requirements in 40 CFR 761.61(a), and the approved Application (i.e., RAP) as modified by the conditions of approval herein.

Departure from the approval conditions herein without prior written permission from USEPA may result in the commencement of proceedings to revoke this approval, and/or an enforcement action. Nothing in

USEPA Conditional Approval Under TSCA, 40 CFR 761.61(c) Remedial Action Plan Former Citrus Processing Plant, Ontario, California Date: August 19, 2011

this approval bars USEPA from imposing penalties for violations of this approval or for violations of other applicable TSCA PCB requirements or for activities not covered under this approval. This approval only applies to the Sunkist Site. USEPA reserves the right to require additional characterization and/or cleanup of PCBs at the Sunkist Site if new information shows that PCBs remain at the Site above the USEPA-approved PCB cleanup levels or if PCBs are found at other areas of the Sunkist Site.

USEPA is hereby approving the Application as modified by the conditions of approval established below. Sunkist and BEC must implement the Application as modified by these conditions.

In this approval, deadlines are based on a specific number of business days from the date of the approval.

- 1. Sunkist PCB Cleanup Site. The Sunkist PCB Cleanup Site (PCS) is located within the 11.11-acre Sunkist Site and encompasses all the areas of the Sunkist Site investigated for PCBs including and not limited to the former location of certain buildings already demolished and their associated basements as well as the location of buildings and related basements still to be demolished. The PCS also encompasses the areas where stockpiles of concrete derived from the demolition of Site buildings are located. Concrete in these stockpiles contain PCBs at various concentrations.
- 2. PCB cleanup level for soils and concrete. The approved PCB cleanup level for soils and concrete is 4.5 milligrams / kilogram (mg/kg). The PCB cleanup level discussed in the RAP (Application) is 6.5 mg/kg PCBs and this approval modifies the cleanup level in the RAP to 4.5 mg/kg. This approval is based on the health risk assessment conducted for the Sunkist Site as revised based on USEPA's comments on the risk assessment and guidance. The approved PCB cleanup is protective of the offsite residential, industrial, and construction worker exposure scenarios evaluated for receptors in proximity to the Site. The approved PCB cleanup level was developed taking into consideration analytical results for PCB Aroclor and dioxin-like PCB congeners.
- 3. Concrete stockpiles, statistical derivation of an additional number of concrete characterization samples. Within 5 days after the date of this approval, Sunkist / BEC must submit for USEPA approval the revised proposed number of additional concrete samples to be collected from each of several stockpiles (about 21) and building basements at the PCS. These stockpiles are listed in the attached table which is an excerpt from BEC's July 22, 2011 letter (Subject: Risk Assessment / RAP Review and Additional Action Items Former Sunkist Citrus Processing Plant. . .). Properly applied SW-846 statistical methodology shall be employed to calculate the number of additional concrete

¹ The attached electronic mail message from Dr. Patrick Wilson (USEPA R9) to Carmen Santos (USEPA R9), <u>Subject:</u> Former Sunkist Citrus Processing Plant Risk Assessment Review & PCB Remediation Goals briefly summarizes USEPA's risk assessment review. Also, refer to BEC's memo from Dr. Heriberto Robles to Brett Bowyer (BEC), <u>Subject:</u> Derivation of Risk-Based Cleanup Levels for PCBs in Crushed Concrete Addendum dated July 22, 2011 and included in BEC's July 22, 2011 letter to USEPA.

Former Citrus Processing Plant, Ontario, California

Date: August 19, 2011

samples. The approved cleanup level of 4.5 mg/kg PCBs shall be used as the regulatory threshold (RT) instead of the 1 mg/kg RT used in the calculations presented in BEC's July 22, 2011 letter. Based on the above, USEPA is requiring that Sunkist / BEC conduct the following steps:

- a. Sunkist / BEC must use the existing data and the current version of ProUCL to separately calculate the distribution-specific 95% upper confidence limit (UCL) on the mean concentration for each stockpile. Stockpiles with UCLs above 4.5 mg/kg PCBs shall be disposed offsite to prevent any exposures to PCBs contained in the concrete from these stockpiles in the future.
- b. For the stockpiles not identified for disposal in Condition C.3.a ("the remaining stockpiles"), the existing concrete stockpile data may be insufficient as to justify onsite use of the remaining concrete. Sunkist / BEC must conduct additional sampling of those stockpiles. The existing data for the remaining stockpiles shall be used to derive the number of additional concrete characterization samples needed for each of the remaining stockpiles using the statistical method specified in SW-846 and a regulatory threshold of 4.5 mg/kg and not of 1 mg/kg. A random sampling approach shall be used to collect the additional concrete samples needed from each remaining stockpile.
- c. Sunkist / BEC shall use the existing PCB characterization data for the remaining stockpiles together with the new data (required in Condition C.3.b) and the current version of ProUCL to calculate a separate UCL for each remaining stockpile. Sunkist / BEC must dispose offsite any stockpiles with a UCL above the 4.5 mg/kg PCB cleanup level (regulatory threshold).

Sunkist / BEC proposed in Section 3.1 (PCB Removals) of the RAP to remove for offsite disposal the crushed concrete in Basement 21, and in stockpiles W-N, D, 10, 16, 17, and 18 (including 18a and 18b). USEPA approves the offsite disposal of the concrete in Basement 21 and in the mentioned stockpiles in context to the approved PCB cleanup level of 4.5 mg/kg.

- 4. Basement 21 Removal Action (Section 4.2.1 of the RAP) and similar removal actions at other former Sunkist building basements. USEPA approves of the proposed remedial action as modified by this condition below and Condition C.3 above. USEPA is approving under 40 CFR 761.61(a) the soil sampling to be conducted in Basement 21 and any other basement from which crushed concrete will be removed.
 - a. Crushed concrete containing PCBs above the cleanup level has been placed in the basement of former Building 21. After the crushed concrete is removed from the basement, Sunkist / BEC proposes to collect composite soil samples following the procedures in 40 CFR 761.289(b)(1)(i). However, those sampling procedures do not apply. Instead, Sunkist / BEC shall collect the composite soil samples following the sampling approach in 40 CFR 761.289(b)(1)(ii), (b)(1)(ii)(A), (b)(1)(ii)(B), and (b)(1)(ii)(C) or equivalent method. Within 10 days after the date of this approval, Sunkist / BEC shall resubmit Figure 10 depicting the soil sampling locations in

USEPA Conditional Approval Under TSCA, 40 CFR 761.61(c) Remedial Action Plan Former Citrus Processing Plant, Ontario, California Date: August 19, 2011

the Building 21 basement and such locations shall be determined based on the sampling method in this regulation.

- 5. Stockpile Sampling and Off-Site Disposal (Section 4.2.2 of the RAP). Sampling of concrete from building basements and in above ground stockpiles must be conducted consistent with the method established in Condition C.3 above.
- 6. Basement 31 Porous Material Sampling (Section 4.2.3 of the RAP). USEPA approves of the sampling approach proposed for the concrete floor in Basement 31 provided the basement is not filled with bulk concrete (crushed or uncrushed). Soil samples shall be collected at concrete sampling locations where PCBs are equal to or higher than 4.5 mg/kg PCBs. One additional soil sample shall be collected in the lift L-42 area for a minimum of three soil samples to be collected from that area for PCB analysis. In addition, if the Basement 31 is filled with bulk concrete, the floor of this basement shall be sampled following the requirement in Condition C.4 above.
- 7. Soil beneath concrete stockpiles. Sunkist / BEC must sample surface soils (0 to 3 inches below ground surface) beneath all the concrete stockpiles to verify that PCBs are not present above the approved PCB cleanup level. Within 10 days after the date of this approval, Sunkist / BEC shall submit for review and approval the sampling approach to make this verification.
- 8. Decontamination of Movable Equipment, Tools, and Sampling Equipment Contaminated by PCBs. Equipment not covered in the USEPA Region 1 SOP must be decontaminated following the requirements in 40 CFR 761.79(c)(2).
- 9. Off-site disposal of decontamination residues, PCB remediation waste, and cleanup wastes. Decontamination residues and cleanup wastes must be disposed based on their original PCB concentration in accordance with 40 CFR 761.79(g)(2), (g)(6), and 40 CFR 761.61(a)(5), (a)(5)(i), (a)(5)(iii), and (a)(5)(v). Concrete and/or other porous surfaces(s) contaminated with PCBs above the PCB cleanup level to be approved must be disposed of as bulk PCB remediation waste in accordance with the requirements in 40 CFR 761.61(a)(5)(i)(B)(2)(ii), (a)(5)(v)(A), and (a)(5)(i)(B)(2)(iii). Disposal of all wastes (e.g., personal protective equipment, soils, concrete) generated during cleanup of PCBs must be in compliance with all applicable federal, state, and local regulations.
- 10. Dust management plan. Within 10 days after the date of this approval, BEC must submit a dust management plan that includes ambient air sampling and it is designed to be protective of workers and the public when conducting any activity at the Site that generates dust such as during crushing of PCB-contaminated concrete, demolition of above ground structures, and demolition of any remaining below ground structures at the Site. The dust management plan shall also be implemented during movement and removal of concrete from the concrete stockpiles and during movement of soils. As part of the dust management plan Sunkist / BEC shall propose a concentration (in mg / m³)

USEPA Conditional Approval Under TSCA, 40 CFR 761.61(c)
Remedial Action Plan

Former Citrus Processing Plant, Ontario, California

Date: August 19, 2011

of dust that is protective of all receptors. Workers must be adequately protected to prevent exposure to PCBs.

11. Extraction and analytical methods. Field and laboratory quality control samples. Under the TSCA PCB regulations the applicant has the option to choose either the Soxhlet extraction method (USEPA Method 3540C) or the Ultrasonic method (USEPA Method 3550C). The Soxhlet extraction method is preferred by USEPA for both concrete and soil samples. If necessary, post extraction and pre-analysis sample cleanup (e.g., USEPA Methods 3665A [sulfuric acid], 3620C [florisil column], 3640A [Gel Permeation Column, GPC]) procedures must be considered if matrix interferences are suspected that could increase analytical method detection limits and compromise comparisons of analytical results to the cleanup levels required in this approval.

Within five (5) days after the date of this approval and before starting sampling at the PCS Sunkist / BEC shall submit a description of quality control (QC) procedures that will be implemented in the field during sample collection (characterization and cleanup verification sampling) and number and type of field QC (e.g., duplicates) samples to be collected for soil and concrete. This description shall also identify the laboratory QC samples (i.e., surrogate spikes, matrix spikes, equipment blanks) that will be prepared and analyzed by the contracted analytical laboratory together with the site samples.

12. Notification of PCB activity. Sunkist / BEC must comply with the notification and manifest requirements of 40 CFR 761, Subpart K when storing onsite, transporting, and disposing of PCBs offsite. Sunkist / BEC must comply with the requirements in 40 CFR 761.65(c)(1) and Sunkist / BEC's storage of PCB waste must not trigger the more stringent requirements in 40 CFR 761.65(b) and 761.65(c)(7) to be exempted from filing the Notification of PCB Activity as a generator of PCB waste.

The transporter of PCB remediation waste from the Sunkist Site must submit to USEPA Headquarters a Notification of PCB Activity Form before transporting the waste to the offsite disposal facility. Sunkist / BEC must dispose offsite all concrete that contains PCBs above the approved cleanup level without further delay. In accordance with 40 CFR 761.61(c), USEPA is extending the storage of PCB remediation waste at the site up to an additional 90 days beyond the 180 days established in 40 CFR 761.65(c)(9). Storage of waste containing PCBs above the cleanup level has already exceeded the 180 days established in 40 CFR 761.65(c)(9).

13. Demonstration of compliance with concrete and soil cleanup level. Sunkist / BEC will calculate the distribution-specific 95% confidence limit of the mean (i.e., the exposure-point concentration) of the analysis results for bulk concrete characterization samples, soil characterization samples, and soil cleanup verification samples separately using USEPA's ProUCL statistical program and compare that exposure point concentration (EPC) for soils and concrete to the cleanup level.

USEPA Conditional Approval Under TSCA, 40 CFR 761.61(c)

Remedial Action Plan

Former Citrus Processing Plant, Ontario, California

Date: August 19, 2011

For concrete in stockpiles and / or placed in former building basements, Sunkist / BEC must refer to Condition C.3 above.

If the EPC for soils is higher than the cleanup level, Sunkist / BEC must conduct additional cleanup of soils and collect cleanup verification samples until the EPC calculated via ProUCL using this additional data is below the cleanup level. If the cleanup level is not achieved after further soil cleanup, Sunkist / BEC shall confer with USEPA as to the next steps that it will take to resolve the matter.

- 14. Areas investigated for non-PCB contamination (Section 4.3 [Non-TSCA Related Soil Removal Activities] of the RAP). Sunkist / BEC have indicated the source of PCBs at the Sunkist Site is unknown. Investigations for non-PCB contaminants have occurred in Area 24C, Area D-5-1, Area L-13-3, Area B-5-1, and Area D-1-1 (collectively referred to as "Non-PCB Areas") and petroleum hydrocarbons and polyaromatic hydrocarbons (PAHs) are present at some of these areas. Given Sunkist's uncertainty on the source of PCBs and the presence of PAHs and petroleum hydrocarbons, USEPA is requesting that cleanup verification sampling to be conducted in the "Non-PCB Areas" include testing for PCBs. Within 15 days after the date of this letter propose the number of soil samples that Sunkist / BEC will collect to demonstrate PCBs are not present in the "Non-PCB Areas" in concentrations above the USEPA-approved PCB cleanup level.
- 15. PCB Cleanup Completion Report. Within 60 days after Sunkist / BEC demonstrate that residual PCBs in soils are equal to or below the USEPA-approved PCB cleanup level, Sunkist / BEC must submit a PCB Cleanup Completion Report for USEPA approval (under 40 CFR 761.61(c)). This report must demonstrate compliance with all the conditions of approval and applicable TSCA PCB regulations in addition to applicable state and local regulations. Sunkist / BEC shall refer to 40 CFR 761.61(a)(9) and 761.125(c)(5) as a guideline to prepare the report and such guideline represents minimum requirements for the required PCB Cleanup Report. This report must provide all relevant sampling and analysis data and justifications demonstrating that Sunkist / BEC achieved the USEPA approved PCB cleanup level and that it met the conditions of approval.
- **16. Deed Restriction.** Within 20 days after the date of this letter, confer with USEPA concerning the deed restriction that will be recorded for the property and in context to the PCB cleanup.



Former Sunkist Citrus Processing Plant Risk Assessment Review & PCB

Remediation Goals

Patrick Wilson to: Carmen Santos

08/05/2011 06:00 PM

From:

Patrick Wilson/R9/USEPA/US

To:

Carmen Santos/R9/USEPA/US@EPA

Good Afternoon Carmen,

We have completed our review of the human health risk assessment reports and supplemental analyses submitted in support of remedial activities taken at the Former Sunkist Citrus Processing Facility in Ontario, Calif. As you know, this analysis was conducted by Bowyer Environmental Consulting for the property located at 616 Sunkist Street in Ontario. The objectives of the analysis were to assess the likelihood and magnitude of human health impacts from exposure to site-related contaminants. In addition, the risk analysis was designed to establish site-specific cleanup concentrations for impacted media which is considerate and protective of the receptor-specific exposure scenarios applied to this site.

This site is contaminated with a broad suite of environmental contaminants. U.S. EPA has retained direct authority over the assessment & cleanup of media impacted by polychlorinated biphenyls (PCBs). Media contaminated by other chemical constituents is regulated by the Hazardous Materials Division - Site Remediation/Local Oversight Program San Bernardino County Fire Department. This local agency receives technical risk assessment support from California-EPA's Office of Environmental Health Hazard Assessment (OEHHA).

As you know, the risk analysis in support of PCB impacted media has undergone several revisions. A number of these revisions have been a direct result of meetings, site visits and conference calls between representatives of Sunkist & EPA. For instance, EPA has recommended that Sunkist sample impacted media and subject it to analysis for the dioxin-like or coplanar PCB congener fraction in order to better characterize the full dimension of risk. As a result, a subset of PCB samples were analyzed not only based upon their aroclor composition, but also for their dioxin-like or coplanar congener content. In addition, EPA has recommended that the industrial worker exposure scenario remain considerate of the entire fraction of contaminated crushed concrete - rather than the 50% exposure fraction initially proposed. These examples are illustrative of specific procedural & methodological recommendations which ultimately resulted in a more conservative estimate of putative impacts and a more conservative cleanup goal.

Our review has found that the revised PCB cleanup concentration of 4.5 mg/kg for on-site soils and concrete is indeed, considerate & protective of the residential, industrial and construction worker exposure scenarios evaluated for receptors proximate to the site. We have independently confirmed the scenario-specific risk estimates for both the cancer endpoint and the non-cancer or systemically-toxic hazard characterization. We have found & confirmed that the carcinogenic risk from exposure to PCB impacted soils & concrete does not exceed Cal-EPA's Department of Toxic Substances Control (DTSC) risk management acceptability criteria for industrial sites of 1E-5. We have also confirmed that the non-cancer hazard from exposure to impacted media at the cleanup goal does not exceed the risk management acceptability criteria of unity (1).

Sunkist has conducted a number of removal operations at the site for impacted soils and concrete. The resulting exposure point concentration (EPC), or more accurately distribution-specific upper confidence limit on the mean (UCL), should therefore not exceed the proposed cleanup goal of 4.5 ppm total PCBs aroclors. It should be noted that this cleanup goal is germane to impacted media remaining on-site and protective of on-site workers consistent with a site-specific industrial exposure scenario(s). Off-site residents located directly adjacent to the former facility are also considered receptors subject to a number of complete exposure pathways. Potential impacts to this receptor group was assessed by application of an Agency-unapproved air dispersion model which estimated the fraction of contaminated dust impacting residential locations. We believe this model is inherently uncertain, has not been subject to Agency

approval or validation, yet is likely to overestimate the fraction of dust impacting residential receptors because of the stability class input applied, and because of the plume dispersion characteristics unique to this model. We strongly recommend that any and all future modelling efforts in this regard be conducted with the Agency's preferred and recommended air dispersion & deposition model, *AERMOD*.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION IX

75 Hawthorne Street San Francisco, CA 94105

Via Electronic Mail and U.S. Postal Service Mail

August 19, 2011

Mr. Keith Rudd Sunkist Growers, Inc. Director of Environmental and Technology 531 West Popular Avenue Tipton, CA 93272

Re: Polychlorinated Biphenyls (PCBs), Toxic Substances Control Act (40 CFR 761.61(c)) – USEPA Conditional Approval of "Remedial Action Plan," Former Sunkist Citrus Plant

Dear Mr. Rudd:

The U.S. Environmental Protection Agency Region 9 (USEPA) is approving with conditions the "Remedial Action Plan" (RAP) for the Former Sunkist Citrus Processing Plant at 616 East Sunkist Boulevard in Ontario, California (Sunkist Site) dated May 22, 2011 and prepared by BEC for Sunkist Growers, Inc. The RAP serves as the polychlorinated biphenyls (PCB) risk-based disposal approval application (Application) required in the Toxic Substances Control Act (TSCA) PCB regulations in 40 CFR 761.61(c). The Application is for the Sunkist PCB Cleanup Site (PCS) encompassed within the 11.11-acre Sunkist Site.

USEPA is approving the RAP (Application) under 40 CFR 761.61(c). Among other things, the Application involves additional characterization sampling for PCBs in soils and concrete, cleanup of PCB-contaminated soils via excavation if necessary, offsite disposal of PCB remediation waste (e.g., soils, concrete), and onsite use of concrete with PCB levels equal to or below 4.5 milligrams/kilograms (mg/kg). USEPA is approving a PCB cleanup level for soils and concrete at the Site equal to 4.5 mg/kg total PCBs which was developed by Sunkist / BEC via a site-specific health risk assessment.

We look forward to being of assistance during Sunkist / BEC's implementation of the approved PCB cleanup Application as modified by USEPA's conditions of approval. Please call Carmen D. Santos at 415.972.3360 if you have any questions concerning this conditional approval.

Sincerely,

Jeff Scott, Director Waste Management Division Keith Rudd

Re: USEPA Conditional Approval – TSCA PCB Cleanup Former Sunkist Citrus Processing Plant, Ontario, California

Date: August 19, 2011

Enclosures (2)

Cc: Steve Armann, USEPA R9 Carmen Santos, USEPA R9

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U.S. EPA CONCURRENCES

OFFICIAL FILE COPY



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION IX 75 Hawthorne Street

San Francisco, CA 94105

August 19, 2011

USEPA Conditional Approval for Former Sunkist Citrus Processing Plant
616 East Sunkist Boulevard
Ontario, California
TSCA PCB Cleanup Under 40 CFR 761.61(c)

A. Introduction

The U.S. Environmental Protection Agency Region 9 (USEPA) hereby approves with conditions the "Remedial Action Plan" (RAP) for the Former Sunkist Citrus Processing Plant, 616 East Sunkist Boulevard, Ontario, California, dated May 22, 2011 and prepared by Bowyer Environmental Consulting (BEC) for Sunkist Growers, Inc. (Sunkist). Sunkist has submitted the RAP under the Toxic Substances Control Act (TSCA) regulations for polychlorinated biphenyls (PCBs) in 40 CFR 761.61(c) (risk-based PCB cleanup). As such, the RAP is the risk-based disposal approval application required under that section of the TSCA regulations for the cleanup of PCBs. The RAP (Application) addresses additional characterization sampling and cleanup of PCBs at the Former Sunkist Plant in Ontario, California (Sunkist Site).

This approval is effective on the date of this enclosure. Section C below contains the conditions of approval.

Any party cleaning up PCBs from soils and structures must do so consistent with the requirements set forth at 40 CFR 761.61. The TSCA PCB regulations in 40 CFR 761.61 establish PCB cleanup options consisting of self-implementing (40 CFR 761.61(a)), performance-based (40 CFR 761.61(b)), or risk-based (40 CFR 761.61(c)) cleanup alternatives. Depending on site-specific factors, USEPA may approve and require implementation of a PCB cleanup following a hybrid approach that applies requirements from multiple cleanup options.

USEPA is approving the Application with conditions under the TSCA regulatory requirements for PCBs in 40 CFR 761.61(c) and 40 CFR 761.61(a).

- B. Former Sunkist Citrus Processing Plant, Sunkist PCB Cleanup Site, Land Use, Sources of PCB Contamination, and PCB Cleanup
- 1. Sunkist Site and Sunkist PCB Cleanup Site. The Sunkist Site consists of approximately 11.11 acres in the City of Ontario. The Sunkist PCB Cleanup Site (PCS) is located within the Sunkist Site.

USEPA Conditional Approval Under TSCA, 40 CFR 761.61(c) Remedial Action Plan Former Citrus Processing Plant, Ontario, California

Date: August 19, 2011

- 2. Current and future land use. According to the Application, the current land use at the Sunkist Site is industrial and the future land use is expected to be industrial. The Sunkist Site operated as a citrus processing plant from 1926 (operated by Sunkists' predecessor Ontario Citrus Exchange) and completed citrus processing operations in 2008. The onsite wastewater treatment plant is still operating at the Site
- 3. Sources of PCB Contamination. Among potential sources of contamination is hydraulic equipment that may have been lubricated with PCB-containing oils. PCB Aroclors 1254 and 1260 have been detected at the site in concrete and soils. In addition, based on a small number of soil samples, dioxin-like PCB congeners were detected at the Site.
- **4. PCB Cleanup.** Among other requirements, the conditions of approval for the PCB cleanup at the Sunkist Site require that Sunkist:
 - Submit additional information concerning further characterization of PCBs in concrete stockpiled in certain areas of the PCS and in building basements.
 - Conduct additional soil characterization.
 - Excavate and dispose offsite (consistent with 40 CFR 761.61(a)) soils, concrete, and asphalt contaminated with PCBs above the USEPA-approved PCB cleanup level of 4.5 mg / kg. This includes any soils contaminated with PCBs above the cleanup level that may be present beneath concrete or asphalt.
 - Conduct soil cleanup verification sampling and analysis in accordance with the required SAP (to be approved under 40 CFR 761.61(c)).
 - Verify compliance with the cleanup level via use of USEPA's ProUCL statistical program.
 - Dispose offsite other cleanup wastes in accordance with 40 CFR 761.61(a).
 - Use onsite concrete that is contaminated with PCBs below the cleanup level.
 - Submit for USEPA approval a PCB Cleanup Completion Report.
 - Restrictive covenant recorded in accordance with state law that among other information documents the onsite use of concrete with PCBs below the PCB cleanup level of 4.5 mg/kg.

C. USEPA's Conditions of Approval

This conditional approval does not relieve the owner and the cleanup party from complying with all other applicable federal, state, and local regulations and permits. Sunkist and BEC must comply with the specified PCB cleanup requirements in 40 CFR 761.61(c), PCB remediation waste disposal requirements in 40 CFR 761.61(a), and the approved Application (i.e., RAP) as modified by the conditions of approval herein.

Departure from the approval conditions herein without prior written permission from USEPA may result in the commencement of proceedings to revoke this approval, and/or an enforcement action. Nothing in

USEPA Conditional Approval Under TSCA, 40 CFR 761.61(c) Remedial Action Plan Former Citrus Processing Plant, Ontario, California Date: August 19, 2011

this approval bars USEPA from imposing penalties for violations of this approval or for violations of other applicable TSCA PCB requirements or for activities not covered under this approval. This approval only applies to the Sunkist Site. USEPA reserves the right to require additional characterization and/or cleanup of PCBs at the Sunkist Site if new information shows that PCBs remain at the Site above the USEPA-approved PCB cleanup levels or if PCBs are found at other areas of the Sunkist Site.

USEPA is hereby approving the Application as modified by the conditions of approval established below. Sunkist and BEC must implement the Application as modified by these conditions.

In this approval, deadlines are based on a specific number of business days from the date of the approval.

- 1. Sunkist PCB Cleanup Site. The Sunkist PCB Cleanup Site (PCS) is located within the 11.11-acre Sunkist Site and encompasses all the areas of the Sunkist Site investigated for PCBs including and not limited to the former location of certain buildings already demolished and their associated basements as well as the location of buildings and related basements still to be demolished. The PCS also encompasses the areas where stockpiles of concrete derived from the demolition of Site buildings are located. Concrete in these stockpiles contain PCBs at various concentrations.
- 2. PCB cleanup level for soils and concrete. The approved PCB cleanup level for soils and concrete is 4.5 milligrams / kilogram (mg/kg). The PCB cleanup level discussed in the RAP (Application) is 6.5 mg/kg PCBs and this approval modifies the cleanup level in the RAP to 4.5 mg/kg. This approval is based on the health risk assessment conducted for the Sunkist Site as revised based on USEPA's comments on the risk assessment and guidance. The approved PCB cleanup is protective of the offsite residential, industrial, and construction worker exposure scenarios evaluated for receptors in proximity to the Site. The approved PCB cleanup level was developed taking into consideration analytical results for PCB Aroclor and dioxin-like PCB congeners.
- 3. Concrete stockpiles, statistical derivation of an additional number of concrete characterization samples. Within 5 days after the date of this approval, Sunkist / BEC must submit for USEPA approval the revised proposed number of additional concrete samples to be collected from each of several stockpiles (about 21) and building basements at the PCS. These stockpiles are listed in the attached table which is an excerpt from BEC's July 22, 2011 letter (Subject: Risk Assessment / RAP Review and Additional Action Items Former Sunkist Citrus Processing Plant. . .). Properly applied SW-846 statistical methodology shall be employed to calculate the number of additional concrete

¹ The attached electronic mail message from Dr. Patrick Wilson (USEPA R9) to Carmen Santos (USEPA R9), <u>Subject:</u> Former Sunkist Citrus Processing Plant Risk Assessment Review & PCB Remediation Goals briefly summarizes USEPA's risk assessment review. Also, refer to BEC's memo from Dr. Heriberto Robles to Brett Bowyer (BEC), <u>Subject:</u> Derivation of Risk-Based Cleanup Levels for PCBs in Crushed Concrete Addendum dated July 22, 2011 and included in BEC's July 22, 2011 letter to USEPA.

USEPA Conditional Approval Under TSCA, 40 CFR 761.61(c)

Remedial Action Plan

Former Citrus Processing Plant, Ontario, California

Date: August 19, 2011

samples. The approved cleanup level of 4.5 mg/kg PCBs shall be used as the regulatory threshold (RT) instead of the 1 mg/kg RT used in the calculations presented in BEC's July 22, 2011 letter. Based on the above, USEPA is requiring that Sunkist / BEC conduct the following steps:

- a. Sunkist / BEC must use the existing data and the current version of ProUCL to separately calculate the distribution-specific 95% upper confidence limit (UCL) on the mean concentration for each stockpile. Stockpiles with UCLs above 4.5 mg/kg PCBs shall be disposed offsite to prevent any exposures to PCBs contained in the concrete from these stockpiles in the future.
- b. For the stockpiles not identified for disposal in Condition C.3.a ("the remaining stockpiles"), the existing concrete stockpile data may be insufficient as to justify onsite use of the remaining concrete. Sunkist / BEC must conduct additional sampling of those stockpiles. The existing data for the remaining stockpiles shall be used to derive the number of additional concrete characterization samples needed for each of the remaining stockpiles using the statistical method specified in SW-846 and a regulatory threshold of 4.5 mg/kg and not of 1 mg/kg. A random sampling approach shall be used to collect the additional concrete samples needed from each remaining stockpile.
- c. Sunkist / BEC shall use the existing PCB characterization data for the remaining stockpiles together with the new data (required in Condition C.3.b) and the current version of ProUCL to calculate a separate UCL for each remaining stockpile. Sunkist / BEC must dispose offsite any stockpiles with a UCL above the 4.5 mg/kg PCB cleanup level (regulatory threshold).

Sunkist / BEC proposed in Section 3.1 (PCB Removals) of the RAP to remove for offsite disposal the crushed concrete in Basement 21, and in stockpiles W-N, D, 10, 16, 17, and 18 (including 18a and 18b). USEPA approves the offsite disposal of the concrete in Basement 21 and in the mentioned stockpiles in context to the approved PCB cleanup level of 4.5 mg/kg.

- 4. Basement 21 Removal Action (Section 4.2.1 of the RAP) and similar removal actions at other former Sunkist building basements. USEPA approves of the proposed remedial action as modified by this condition below and Condition C.3 above. USEPA is approving under 40 CFR 761.61(a) the soil sampling to be conducted in Basement 21 and any other basement from which crushed concrete will be removed.
 - a. Crushed concrete containing PCBs above the cleanup level has been placed in the basement of former Building 21. After the crushed concrete is removed from the basement, Sunkist / BEC proposes to collect composite soil samples following the procedures in 40 CFR 761.289(b)(1)(i). However, those sampling procedures do not apply. Instead, Sunkist / BEC shall collect the composite soil samples following the sampling approach in 40 CFR 761.289(b)(1)(ii), (b)(1)(ii)(A), (b)(1)(ii)(B), and (b)(1)(ii)(C) or equivalent method. Within 10 days after the date of this approval, Sunkist / BEC shall resubmit Figure 10 depicting the soil sampling locations in

USEPA Conditional Approval Under TSCA, 40 CFR 761.61(c) Remedial Action Plan Former Citrus Processing Plant, Ontario, California Date: August 19, 2011

the Building 21 basement and such locations shall be determined based on the sampling method in this regulation.

- 5. Stockpile Sampling and Off-Site Disposal (Section 4.2.2 of the RAP). Sampling of concrete from building basements and in above ground stockpiles must be conducted consistent with the method established in Condition C.3 above.
- 6. Basement 31 Porous Material Sampling (Section 4.2.3 of the RAP). USEPA approves of the sampling approach proposed for the concrete floor in Basement 31 provided the basement is not filled with bulk concrete (crushed or uncrushed). Soil samples shall be collected at concrete sampling locations where PCBs are equal to or higher than 4.5 mg/kg PCBs. One additional soil sample shall be collected in the lift L-42 area for a minimum of three soil samples to be collected from that area for PCB analysis. In addition, if the Basement 31 is filled with bulk concrete, the floor of this basement shall be sampled following the requirement in Condition C.4 above.
- 7. Soil beneath concrete stockpiles. Sunkist / BEC must sample surface soils (0 to 3 inches below ground surface) beneath all the concrete stockpiles to verify that PCBs are not present above the approved PCB cleanup level. Within 10 days after the date of this approval, Sunkist / BEC shall submit for review and approval the sampling approach to make this verification.
- 8. Decontamination of Movable Equipment, Tools, and Sampling Equipment Contaminated by PCBs. Equipment not covered in the USEPA Region 1 SOP must be decontaminated following the requirements in 40 CFR 761.79(c)(2).
- 9. Off-site disposal of decontamination residues, PCB remediation waste, and cleanup wastes. Decontamination residues and cleanup wastes must be disposed based on their original PCB concentration in accordance with 40 CFR 761.79(g)(2), (g)(6), and 40 CFR 761.61(a)(5), (a)(5)(i), (a)(5)(iii), and (a)(5)(v). Concrete and/or other porous surfaces(s) contaminated with PCBs above the PCB cleanup level to be approved must be disposed of as bulk PCB remediation waste in accordance with the requirements in 40 CFR 761.61(a)(5)(i)(B)(2)(ii), (a)(5)(v)(A), and (a)(5)(i)(B)(2)(iii). Disposal of all wastes (e.g., personal protective equipment, soils, concrete) generated during cleanup of PCBs must be in compliance with all applicable federal, state, and local regulations.
- 10. Dust management plan. Within 10 days after the date of this approval, BEC must submit a dust management plan that includes ambient air sampling and it is designed to be protective of workers and the public when conducting any activity at the Site that generates dust such as during crushing of PCB-contaminated concrete, demolition of above ground structures, and demolition of any remaining below ground structures at the Site. The dust management plan shall also be implemented during movement and removal of concrete from the concrete stockpiles and during movement of soils. As part of the dust management plan Sunkist / BEC shall propose a concentration (in mg / m³)

USEPA Conditional Approval Under TSCA, 40 CFR 761.61(c) Remedial Action Plan Former Citrus Processing Plant, Ontario, California

Date: August 19, 2011

of dust that is protective of all receptors. Workers must be adequately protected to prevent exposure to PCBs.

11. Extraction and analytical methods. Field and laboratory quality control samples. Under the TSCA PCB regulations the applicant has the option to choose either the Soxhlet extraction method (USEPA Method 3540C) or the Ultrasonic method (USEPA Method 3550C). The Soxhlet extraction method is preferred by USEPA for both concrete and soil samples. If necessary, post extraction and pre-analysis sample cleanup (e.g., USEPA Methods 3665A [sulfuric acid], 3620C [florisil column], 3640A [Gel Permeation Column, GPC]) procedures must be considered if matrix interferences are suspected that could increase analytical method detection limits and compromise comparisons of analytical results to the cleanup levels required in this approval.

Within five (5) days after the date of this approval and before starting sampling at the PCS Sunkist / BEC shall submit a description of quality control (QC) procedures that will be implemented in the field during sample collection (characterization and cleanup verification sampling) and number and type of field QC (e.g., duplicates) samples to be collected for soil and concrete. This description shall also identify the laboratory QC samples (i.e., surrogate spikes, matrix spikes, equipment blanks) that will be prepared and analyzed by the contracted analytical laboratory together with the site samples.

12. Notification of PCB activity. Sunkist / BEC must comply with the notification and manifest requirements of 40 CFR 761, Subpart K when storing onsite, transporting, and disposing of PCBs offsite. Sunkist / BEC must comply with the requirements in 40 CFR 761.65(c)(1) and Sunkist / BEC's storage of PCB waste must not trigger the more stringent requirements in 40 CFR 761.65(b) and 761.65(c)(7) to be exempted from filing the Notification of PCB Activity as a generator of PCB waste.

The transporter of PCB remediation waste from the Sunkist Site must submit to USEPA Headquarters a Notification of PCB Activity Form before transporting the waste to the offsite disposal facility. Sunkist / BEC must dispose offsite all concrete that contains PCBs above the approved cleanup level without further delay. In accordance with 40 CFR 761.61(c), USEPA is extending the storage of PCB remediation waste at the site up to an additional 90 days beyond the 180 days established in 40 CFR 761.65(c)(9). Storage of waste containing PCBs above the cleanup level has already exceeded the 180 days established in 40 CFR 761.65(c)(9).

13. Demonstration of compliance with concrete and soil cleanup level. Sunkist / BEC will calculate the distribution-specific 95% confidence limit of the mean (i.e., the exposure-point concentration) of the analysis results for bulk concrete characterization samples, soil characterization samples, and soil cleanup verification samples separately using USEPA's ProUCL statistical program and compare that exposure point concentration (EPC) for soils and concrete to the cleanup level.

USEPA Conditional Approval Under TSCA, 40 CFR 761.61(c) Remedial Action Plan Former Citrus Processing Plant, Ontario, California Date: August 19, 2011

For concrete in stockpiles and / or placed in former building basements, Sunkist / BEC must refer to Condition C.3 above.

If the EPC for soils is higher than the cleanup level, Sunkist / BEC must conduct additional cleanup of soils and collect cleanup verification samples until the EPC calculated via ProUCL using this additional data is below the cleanup level. If the cleanup level is not achieved after further soil cleanup, Sunkist / BEC shall confer with USEPA as to the next steps that it will take to resolve the matter.

- 14. Areas investigated for non-PCB contamination (Section 4.3 [Non-TSCA Related Soil Removal Activities] of the RAP). Sunkist / BEC have indicated the source of PCBs at the Sunkist Site is unknown. Investigations for non-PCB contaminants have occurred in Area 24C, Area D-5-1, Area L-13-3, Area B-5-1, and Area D-1-1 (collectively referred to as "Non-PCB Areas") and petroleum hydrocarbons and polyaromatic hydrocarbons (PAHs) are present at some of these areas. Given Sunkist's uncertainty on the source of PCBs and the presence of PAHs and petroleum hydrocarbons, USEPA is requesting that cleanup verification sampling to be conducted in the "Non-PCB Areas" include testing for PCBs. Within 15 days after the date of this letter propose the number of soil samples that Sunkist / BEC will collect to demonstrate PCBs are not present in the "Non-PCB Areas" in concentrations above the USEPA-approved PCB cleanup level.
- 15. PCB Cleanup Completion Report. Within 60 days after Sunkist / BEC demonstrate that residual PCBs in soils are equal to or below the USEPA-approved PCB cleanup level, Sunkist / BEC must submit a PCB Cleanup Completion Report for USEPA approval (under 40 CFR 761.61(c)). This report must demonstrate compliance with all the conditions of approval and applicable TSCA PCB regulations in addition to applicable state and local regulations. Sunkist / BEC shall refer to 40 CFR 761.61(a)(9) and 761.125(c)(5) as a guideline to prepare the report and such guideline represents minimum requirements for the required PCB Cleanup Report. This report must provide all relevant sampling and analysis data and justifications demonstrating that Sunkist / BEC achieved the USEPA approved PCB cleanup level and that it met the conditions of approval.
- **16. Deed Restriction.** Within 20 days after the date of this letter, confer with USEPA concerning the deed restriction that will be recorded for the property and in context to the PCB cleanup.



Former Sunkist Citrus Processing Plant Risk Assessment Review & PCB

Remediation Goals

Patrick Wilson to: Carmen Santos 08/05/2011 06:00 PM

From:

Patrick Wilson/R9/USEPA/US

To:

Carmen Santos/R9/USEPA/US@EPA

Good Afternoon Carmen,

We have completed our review of the human health risk assessment reports and supplemental analyses submitted in support of remedial activities taken at the Former Sunkist Citrus Processing Facility in Ontario, Calif. As you know, this analysis was conducted by Bowyer Environmental Consulting for the property located at 616 Sunkist Street in Ontario. The objectives of the analysis were to assess the likelihood and magnitude of human health impacts from exposure to site-related contaminants. In addition, the risk analysis was designed to establish site-specific cleanup concentrations for impacted media which is considerate and protective of the receptor-specific exposure scenarios applied to this site.

This site is contaminated with a broad suite of environmental contaminants. U.S. EPA has retained direct authority over the assessment & cleanup of media impacted by polychlorinated biphenyls (PCBs). Media contaminated by other chemical constituents is regulated by the Hazardous Materials Division - Site Remediation/Local Oversight Program San Bernardino County Fire Department. This local agency receives technical risk assessment support from California-EPA's Office of Environmental Health Hazard Assessment (OEHHA).

As you know, the risk analysis in support of PCB impacted media has undergone several revisions. A number of these revisions have been a direct result of meetings, site visits and conference calls between representatives of Sunkist & EPA. For instance, EPA has recommended that Sunkist sample impacted media and subject it to analysis for the dioxin-like or coplanar PCB congener fraction in order to better characterize the full dimension of risk. As a result, a subset of PCB samples were analyzed not only based upon their aroclor composition, but also for their dioxin-like or coplanar congener content. In addition, EPA has recommended that the industrial worker exposure scenario remain considerate of the entire fraction of contaminated crushed concrete - rather than the 50% exposure fraction initially proposed. These examples are illustrative of specific procedural & methodological recommendations which ultimately resulted in a more conservative estimate of putative impacts and a more conservative cleanup goal.

Our review has found that the revised PCB cleanup concentration of 4.5 mg/kg for on-site soils and concrete is indeed, considerate & protective of the residential, industrial and construction worker exposure scenarios evaluated for receptors proximate to the site. We have independently confirmed the scenario-specific risk estimates for both the cancer endpoint and the non-cancer or systemically-toxic hazard characterization. We have found & confirmed that the carcinogenic risk from exposure to PCB impacted soils & concrete does not exceed Cal-EPA's Department of Toxic Substances Control (DTSC) risk management acceptability criteria for industrial sites of 1E-5. We have also confirmed that the non-cancer hazard from exposure to impacted media at the cleanup goal does not exceed the risk management acceptability criteria of unity (1).

Sunkist has conducted a number of removal operations at the site for impacted soils and concrete. The resulting exposure point concentration (EPC), or more accurately distribution-specific upper confidence limit on the mean (UCL), should therefore not exceed the proposed cleanup goal of 4.5 ppm total PCBs aroclors. It should be noted that this cleanup goal is germane to impacted media remaining on-site and protective of on-site workers consistent with a site-specific industrial exposure scenario(s). Off-site residents located directly adjacent to the former facility are also considered receptors subject to a number of complete exposure pathways. Potential impacts to this receptor group was assessed by application of an Agency-unapproved air dispersion model which estimated the fraction of contaminated dust impacting residential locations. We believe this model is inherently uncertain, has not been subject to Agency

approval or validation, yet is likely to overestimate the fraction of dust impacting residential receptors because of the stability class input applied, and because of the plume dispersion characteristics unique to this model. We strongly recommend that any and all future modelling efforts in this regard be conducted with the Agency's preferred and recommended air dispersion & deposition model, *AERMOD*.

Letter of Transmittal



Date: May 25, 2011

Ms. Carmen Santos USEPA Region 9 75 Hawthorne Street San Francisco, CA 94105 From: Bowyer Environmental Consulting Inc. 17011 Beach Blvd., Ste. 900

Huntington Beach, CA 92647

(877) 232-4620

brettbowyer@bowyerenvironmental.com

Dear Ms. Santos,

Enclosed please find 1 hard copy and 1 CD of the: REMEDIAL ACTION PLAN For Sunkist Growers, Inc.

Please call if you have any questions.

Thank you,

Brett Bowyer

Letter of Transmittal



Date: April 14, 2011

Carmen D. Santos PCB Coordinator Waste Management Division U.S. Environmental Protection Agency Region 9 75 Hawthorne Street San Francisco, CA 94105 From: Bowyer Environmental Consulting Inc.

17011 Beach Blvd., Ste. 900 Huntington Beach, CA 92647

(877) 232-4620

brettbowyer@bowyerenvironmental.com

Dear Ms. Santos,

Enclosed please find 2 hard copies of the: RISK ASSESSMENT –SOIL AND CRUSHED CONCRETE For Sunkist Growers, Inc.

Please call if you have any questions.

Thank you,

Brett Bowyer



November 15, 2010

VIA ELECTRONIC MAIL

Mr. Jackson Crutsinger, R.E.H.S., R.H.S.P.
Hazardous Materials Specialist III
Hazardous Materials Division – Site Remediation/Local Oversight Program
San Bernardino County Fire Department
620 South "E" Street
San Bernardino, CA 92415-0153

Subject:

Data Summary and Planned Human Health Risk Assessment

Former Sunkist Citrus Processing Plant - County Site No. 2009004

616 E. Sunkist Street Ontario, California

Dear Mr. Crutsinger:

This data summary is being provided to update the San Bernardino County Fire Department - Hazardous Materials Division (HMD) regarding ongoing environmental monitoring and removal action activities that are being conducted in conjunction with the demolition of the former Sunkist Citrus Processing Plant (Site). In addition, a plan for the implementation of a Site-specific human health risk assessment (HHRA) is being provided. The Site is located at 616 E. Sunkist Street in Ontario, California as shown on Figure 1.

This work is being conducted per the Removal Action Workplan (BEC, June 4, 2010), which was approved by the HMD on June 16, 2010. As described in the Removal Action Workplan, a Site-specific HHRA option would be implemented if warranted based on results of additional testing performed during the environmental monitoring program. Based on the results obtained to date as summarized in this document, Sunkist has decided to implement the HHRA program at this time. As demolition activities are proceeding and the property is scheduled to be transferred to the City of Ontario as soon as demolition and any necessary remedial actions have been completed,

Sunkist is requesting that HMD, and the Santa Ana Regional Water Quality Control Board (RWQCB) facilitate the review of the HHRA by contracting and coordinating with the Office of Environmental Health Hazard Assessment (OEHHA).

BACKGROUND

The approximately 11.11-acre Site is located in the City of Ontario, approximately 1 mile west of the Ontario International Airport, and between the San Bernardino Freeway (Highway 10) to the north, and the Pomona Freeway (Highway 60) to the south.

General Geology and HydroGeology

The Site is located within the Pomona/Chino Valley, which is bordered on the north by the San Gabriel Mountains, on the east by the San Jacinto Fault, on the south by the Santa Ana Mountains, and on the west by the San Jose/Puente/Chino Hills. The area near the Site is reportedly underlain by young alluvial fan deposits of fine-to-coarse-grained sedimentary units formed by the San Antonio Creek and its tributaries (California Department of Conservation, Division of Mines and Geology, 2000).

A significant groundwater investigation is being conducted to the west of the Site in association with the former General Electric Company Flatiron facility (234 East Main Street, Ontario, California). Based on the 3rd Quarter 2008 Groundwater Monitoring Report (AMEC, Geomatrix, Inc., November 24, 2008), the depth to groundwater within the general vicinity of the Site is between 265 and 369 feet beneath ground surface (bgs). Groundwater reportedly flows towards the south within the general vicinity of the Site.

History of Site Operations

According to the *Historic Context for the City of Ontario's Citrus Industry* (City of Ontario Planning Department, February, 2007), the Site was developed as a citrus by-products plant in 1926 by the Ontario Citrus Exchange (a predecessor to Sunkist). As of early 2010, the site consisted of 23 buildings, a waste water treatment plant, a Dryers Area, a Waste/Heat area, a Wet Peel Area, and a fenced in Edison Transformer. These operational features are shown on Figure 2. The two large fruit bins shown in the southwestern area of the Site (Figure 2) were removed several years ago, and were no longer present at the Site as of the initiation of demolition activities.

For the most part Sunkist terminated citrus processing at the Site in 2008. The waste water treatment plant continues to operate at the Site to accommodate the ongoing bulk storage operation that Partners Alliance operates at 617 E. Sunkist Street (directly north

of the Site). Partners Alliance is in the process of rerouting waste water to the Inland Empire Utilities Agency (IEUA) system and will no longer need to utilize the waste water treatment system.

Future Planned Property Use

The City of Ontario (City) is in the process of acquiring the Site in association with a new commercial and/or industrial development. It is our understanding that the City plans to hold the property for a period of time pending future development. Possible future development plans include the development of a new multi-tenant industrial park.

Previous Environmental Investigations

On behalf of the City, Leighton Consulting, Inc. (Leighton) conducted a Limited Phase II Environmental Site Assessment (Phase II Investigation) at the Site in October 2008. In addition, BEC conducted a data gap investigation in August 2009. Based on these investigations, two areas (Area 11C and Area 20) were found to contain polychlorinated biphenyls (PCBs) at concentrations in excess of conservative screening criteria (CSC) for commercial/industrial property use. One additional area (Area 24C) was found to contain total and soluble lead in excess of CSCs. CSCs utilized in this evaluation included the Commercial/Industrial California Human Health Screening Levels (CHHSLs), Industrial Region IX Preliminary Remediation Goals (PRGs), and state and federal hazardous waste criteria.

As summarized in BEC's July 31, 2009 Interim Report - Soil Removal and Confirmation Sampling Report (Interim Report), an initial soil removal activity was implemented to address these areas. However, due to the presence of existing structures, further excavations and soil removal activities in two areas (11C and 24C) were deferred until the overlying structures had been removed.

A Removal Action Workplan, associated with additional remedial and environmental activities to be conducted during the demolition of subsurface structures was prepared (BEC, June 4, 2010). The HMD approved the Removal Action Workplan on June 16, 2010.

SUMMARY OF SITE DEMOLITION ACTIVITIES

Demolition activities began at the Site in early 2010. These activities have included the removal of most of the 23 former structures. As of the current date, the only buildings that remain on the Site are buildings No. 15, 12, 31, and the floor of Building 22. The previous and currently existing building locations are shown on Figure 2.

Prior to demolition, asbestos and lead abatement activities were implemented. These abatement activities were conducted as per the requirements of the South Coast Air Quality Management District (SCAQMD). In addition, environmental monitoring activities have been conducted per the HMD-approved Removal Action Workplan. These activities are described in the following subsections.

Environmental Monitoring During Demolition

BEC personnel have conducted environmental monitoring to evaluate soil conditions during the removal of foundation, asphalt, roadways and other surface and sub-grade structural features. The environmental monitoring has consisted of a three-tiered process, including:

- Visual monitoring of all exposed soil for obvious staining or other visual impact;
- · Olfactory monitoring of all exposed soil for noticeable odors; and
- Field screening with a flame ionization and photoionization detector (FID/PID) in order to document soil that exhibits elevated readings of VOCs.

Locations that exhibited one or more of the three monitoring criteria were deemed to be Areas of Concern (AOCs). Soil samples were collected from each of these areas and analyzed for the following parameters:

- California Administration Manual (CAM) metals by USEPA Method 6000 and 7000 Series;
- Hexavalent chromium by USEPA Method 7096A;
- Total petroleum hydrocarbons (TPH) in the gasoline, diesel and oil ranges by USEPA Method 8015M;
- Polyaromatic hydrocarbons (PAHs) by USEPA Method 8270C SIM;
- Semi-volatile organic compounds (SVOCs) by USEPA Method 8270C;

- Polychlorinated biphenyls (PCBs) by USEPA Method 8082;
- Pesticides by USEPA Method 8081A; and
- Volatile organic compounds (VOCs) by USEPA Method 8260B.

In addition, at each former lift locations, two soil samples were collected and analyzed for TPH and PCBs even when an AOC was not identified during the environmental monitoring process.

A total of twenty-four AOCs have been observed based on field monitoring (staining, odor and/or photoionization detector readings) as of October 30 2010. Samples have also been collected from beneath six lifts during this time period. Three additional samples were collected from stockpiled asphalt and soil that was generated during the surface removal process. The locations of the AOCs are shown on Figure 3. The location of the stockpiles is shown on Figure 4. The AOC results are summarized on Table 1 and the results from samples collected from soil and asphalt stockpiles are summarized on Table 2. Specific results from analysis conducted on samples collected at AOCs, lifts, and stockpiled soil/asphalt are summarized on Tables 3 through 9.

Based on the results, soil samples collected from sixteen of the thirty AOC and lift sampling locations did not contain concentrations in excess of CSCs. Of the other fourteen AOC and lift soil sampling locations the following compounds were observed at concentrations in excess of CSC:

- PCBs four AOCs and one lift;
- Diesel-range hydrocarbons Four AOCs and one lift;
- Gasoline-range hydrocarbons One AOC;
- PCBs and diesel-range hydrocarbons One lift;
- PCBs and total chromium One AOC; and
- PCBs and PAHs One AOC.

Initial Removal Action - Lift 64

Two large stockpiles of partially processed concrete were created during the initial phases of the Site demolition process. In addition, basement structures, of various depths, were present beneath Buildings 11, 21 and 64. In order to help balance the future Site grade conditions (grading to be performed in the future by the City at a later date), it was decided that the concrete would be crushed and placed within the basements. Based on the sampling performed beneath the former lifts as part of the

environmental monitoring during grading, the presence of PCBs in excess of CSC was observed in soil beneath former Lift 64. In order to allow the crushed concrete to be placed within Basement 64, an early removal action was implemented at this location. This removal action was conducted on September 20, 2010.

The removal action consisted of excavating soil to depths of 5.0 feet from beneath the former lift. It should be noted that the bottom of the lift was recessed approximately 5.0 feet beneath the floor of the basement. As the basement for Building 64 was approximately 12 feet bgs, the 5.0 foot excavation beneath Lift 64 took place at depths of 17 to 22 feet bgs. An area of approximately 140 feet (14 by 10 feet) was excavated from beneath former lift 64 as shown on Figure 5.

This excavation generated approximately 25 cubic yards of soil. The soil has been stockpiled with other excavate material as shown on Figure 4.

Following the excavation, four sidewall samples were collected from the approximately midpoint of the excavation on the north, south, east and west walls. In addition, one floor sample was collected from the bottom of the excavation. Per the Removal Action Workplan, the confirmation samples were to be analyzed for compounds that were observed to be in excess of CSC based on sampling performed during the environmental monitoring task. As PCBs were the only compound observed at this AOC in excess of CSC, each of the five confirmation samples were analyzed for PCBs.

The results of these analyses are shown on Table 10. As shown, none of the confirmation samples contained detectable levels of PCBs.

These results were provided to the HMD and a Site inspection was conducted on September 29, 2010. Based on the results obtained, the HMD verbally concurred with the conclusion that no further work was required in association with former Lift 64, and the excavation could be backfilled. A copy of the email correspondence that documents the HMD's verbal approval is attached.

Demolished Concrete

Concrete, brick and other materials generated during the demolition process was initially stockpiled into two large, partially processed stockpiles. On September 3, 2010, the crushing of this concrete commenced. As previously described, given space constraint at the site, the initially crushed concrete was placed directly into three basement structures that underlay the former Buildings 11, 21 and 64. Upon the initiation of crushing operations (September 3, 2010), twenty-three samples of this partially processed material and one sample of the initial crushed material was

collected. Each of these twenty-four samples was analyzed for PCBs and TPH, given that these were the compounds that were most frequently observed in subsurface soil samples collected at the AOCs and lifts. In addition, four partially processed and one of the initial crushed samples were also analyzed for VOCs, PAHs, pesticides and total metals. Results of these analyses did not detect the presence of VOCs or pesticides. In addition, relatively low levels of metals, PAHs and TPH were observed. PCBs were observed in several of the partially processed samples and within the crushed sample. However, the average concentration observed in the partially processed material, and the concentration observed in the initial crushed sample were lower than CSC.

Based on these results, and the logistical problems posed by the space constraints on the Site, it was decided to continue to crush and place the concrete within the existing basement structures. Following the filling of the basements, enough space would be created to allow the remaining crushed material to be stockpiled at the Site. Samples of the crushed concrete were collected at a rate of approximately one sample per every 500 cubic yards of material generated. Each of these samples has been analyzed for PCBs, given that this was the only compound observed in the initial samples that exhibited a discrete sample concentration in excess of CSC.

Tables 11, 12, 13 and 14 summarize the concrete sample results for PCBs, TPH, metals, PAHs, respectively. Tables associated with VOCs and pesticides were not prepared as these compounds were not detected during the initial sampling of partially processed and crushed concrete. As shown on Table 11, the PCB concentrations detected in the crushed concrete have ranged from non detect to 27.2 milligrams per kilogram (mg/kg).

Sampling of Pre-Excavation Asphalt

In order to evaluate the remaining in-place asphalt for incorporation into the concrete crushing effort, ten samples were collected from this material from various locations across the Site on October 5, 2010. As described under the description of environmental monitoring during demolition section of this summary, excavated asphalt had been tested for PCBs, VOCs, PAHs, TPH, total metals and pesticides. The results obtained from these samples (SP-ASP-1 and SP-ASP-2) are summarized on Tables 3, 4, 5, 6, 7, and 8. The results of these analyses showed that only PCBs were present at concentrations in excess of CSC in the stockpiled asphalt. Lead was present at concentrations of greater than ten times the Soluble Threshold Limit Concentration (STLC). As a result, both samples were analyzed by the Waste Extraction Test, and the concentration of the leachate was found to be less than the STLC. The Waste Extraction Test results are shown on Table 9.

Based on these results, each of the ten samples collected from the pre-excavated asphalt were analyzed for PCBs. Results obtained from these analyses are summarized on Table 15. As shown, PCBs were observed in only one sample at concentrations in excess of CSC. Based on these results, and the more elevated PCB results obtained on the crushed concrete (see previous section), it was determined that removing the remaining asphalt and incorporating it into the on-going concrete crushing program was not likely to increase PCB concentrations within the crushed material.

PLAN FOR ADDITIONAL DATA EVALUATION AND REMEDIATION

As described in the Removal Action Workplan, a Site-specific HHRA option would be implemented if warranted based on results of additional testing performed during the environmental monitoring program. The relatively wide-range observation of PCBs in excess of the CSC, particularly within the crushed concrete, warrants the implementation of this further evaluation effort. Following the completion of the HHRA, the need and extent of remedial actions will be re-assessed.

The HHRA will consist of the following primary components:

- Data collection/evaluation and identification of chemicals of potential concern (COPCs);
- Exposure assessment;
- Toxicity assessment; and
- Risk characterization.

Potential receptors will be defined as humans that may contact (i.e., be exposed to) Siterelated chemicals in environmental media. Consistent with USEPA guidance, current and reasonably anticipated future land use is considered when selecting potential receptors (USEPA, 1989, 1995). As described previously, future land use at this Site will be limited to commercial/industrial purposes. As such, potential current and/or future human receptors at the Site that will be evaluated in the HHRA include:

- Indoor Worker A worker in a commercial building or office;
- Outdoor Nonintrusive Worker A future facility maintenance worker who is not engaged in intrusive activities (i.e., digging into soil); and
- Excavation Worker/Construction Worker A future utility-line worker who
 is engaged in short-term intrusive activities.

Potential risks and hazards to Site visitors will not be quantitatively evaluated in this HHRA because their exposure would be significantly less than that of either the indoor or outdoor worker.

Given the current and future land use (commercial/industrial), the specific cancer and noncancer risk criteria utilized in the HHRA will be:

- Incremental Lifetime Cancer Risk < 1X10-5;
- Hazard Index < 1; and
- Blood lead levels < 10 micrograms per deciliter (ug/dl).

Unit risks based on these criteria may be calculated on a sample-by-sample basis to allow for an evaluation of the specific areas to be remediated (if necessary) to meet the specific cancer and noncancer risk criteria.

Selection of Chemicals of Potential Concern

As described in previous sections, a series of soil and soil gas investigations were conducted at the Site prior to the implementation of demolition activities. In addition, a significant data set has been collected during environmental monitoring associated with the demolition. All of this data will be summarized and considered in the HHRA. Chemicals that were analyzed but not detected in any samples will be eliminated and not considered COPCs. Offsite background data are not available for comparison with Site data. However, regional background level for arsenic and PAHs (as B[a]P-Toxicity Equivalent [TE]) have been established. These regional background criteria will be used in the evaluation of arsenic and PAHs in the HHRA. In addition, lead concentrations in soil will be evaluated using the Cal-EPA's LeadSpread 7 model.

Exposure Assessment

The exposure assessment will consist of two primary components. The first component is the identification of exposure pathways. The second component is the calculation of exposure point concentrations (EPCs).

An exposure pathway is the course that a chemical or physical agent takes from a source to an exposed receptor. Exposure pathways describe how an individual is exposed to chemicals or physical agents at, or originating from, a site. Each exposure pathway includes a source or release from a source, an exposure-point location, and an exposure route. If the exposure-point location differs from the source location, a transport or exposure medium (e.g., air) or media (in cases of intermediate transfer) also

is involved. Site-related sources, types of environmental releases, and potential receptors and activity patterns determine the significant pathways of concern.

A Site Conceptual Model (SCM) will be developed to identify and qualify pathways of concern at the Site. Key considerations to be included in the CSM are presented in the following subsections.

Soil and Outdoor Air - Soil represents a source and transport medium for Site-related chemicals. Potential release mechanisms for contaminants in surface and shallow-subsurface soil include tracking, excavation, fugitive dust generation, volatilization, and uptake from contact. Many factors affect the bioavailability and release of chemicals from soil: soil geochemistry, temperature, pH, organic-carbon content, particle size, moisture content, and contaminant characteristics (such as vapor pressure, solubility, and adsorption/desorption rates). Uptake of soil contaminants also is affected by the biology of the receptor, including variables such as age, body size, sex, and metabolic and excretion rates. Human receptors may be indirectly exposed to contaminants from soil via inhalation of dust, and may be directly exposed to contaminants in surface or shallow subsurface soils via incidental ingestion and dermal contact. Receptor-specific pathways for exposure to COPCs in soil that will be considered include the following:

- Indoor Worker These receptors are assumed to work inside a building and do not contact COPCs in soil; therefore, there are no completed soil exposure pathways.
- Outdoor Nonintrusive Workers and Excavation Workers Current and/or future outdoor nonintrusive workers and excavation workers may be exposed to COPCs in soil via incidental ingestion and dermal contact with soil, inhalation of fugitive dusts from surface soils (containing semivolatile chemicals), and potential volatilization of VOCs to ambient air from soil (down to 10 feet bgs) that could be brought up to the surface as a result of construction activities. Inhalation of VOCs volatilized from soil into outdoor air will not be evaluated quantitatively since risks and hazards are significantly less than the subsurface-to-indoor air pathway, which is described in the following subsection.

Indoor Air - Site-related VOCs may migrate into soil pore-space and then into structures (i.e., via floor cracks). The HHRA will assume that Indoor Workers spend all of their working time indoors and will be exposed to chemicals volatilized from soil gas into indoor air via inhalation of indoor air.

Groundwater - As described previously, groundwater has not been encountered during investigation activities conducted at the Site. Based on nearby investigations, the depth to groundwater at the Site is greater than 250 feet bgs. The vertical extent of chemical

impacts at the Site has been evaluated and found to be relatively shallow. In addition, the primary chemicals of concern identified during investigations and remedial monitoring during Site demolition activities (PCBs, diesel-range hydrocarbons and to a lesser extent lead and chromium) have relatively low solubilities and are not highly mobile in the subsurface. Given the nature of the compounds detected, the limited vertical extent of these compounds and the known depth to water at the Site, the potential for direct human exposure through a groundwater pathway is insignificant. As a result, this pathway will not be considered to be complete within the SCM.

Following the completion of the SCM, EPCs will be selected for each medium, and the exposures for each receptor will be quantified. The process for EPC selection and the algorithms used to quantify exposures will be fully documented in the HHRA.

Toxicity Assessment

In developing toxicity values in the HHRA, the following hierarchy of toxicity values will be used to calculate soil or soil-gas risks and noncancer hazards:

- Cancer potency factors (slope factors or unit risk factors) or chronic noncancer toxicity criteria (reference doses [RfD] or reference exposure levels) promulgated in California regulations.
- Cancer potency factors developed by Cal-EPA's OEHHA.
- Toxicity values used to develop environmental criteria promulgated into California regulations. This refers to toxicity values used in deriving "No Significant Risk Levels" and Maximum Allowable Dose Levels" under the State's Safe Drinking Water and Enforcement Act of 1986 (Proposition 65), or in deriving State drinking water MCLs.
- USEPA's Integrated Risk Information System database (USEPA, 2009c).
- Values cited in the most recent USEPA (2009a) RSL tables, including Provisional Peer Reviewed Toxicity Values, USEPA (1997) Health Effects Assessment Summary Tables, and values from the Agency for Toxic Substances and Disease Registry.

Risk Characterization

In the risk characterization step, quantification of risks and hazards is accomplished by combining the results of the exposure assessment (estimated chemical intakes or air exposure concentrations) with the results of the dose-response assessment (toxicity values identified in the toxicity assessment) to provide numerical estimates of potential

health effects. The quantification approach differs for potential noncancer and cancer effects. These differences will be fully described in the HHRA.

In addition, unit risks may be calculated on a sample-by-sample basis to allow for an evaluation of the specific areas to be remediated (if necessary). The unit risk calculations will be performed if any of the following specific cancer and noncancer risk criteria are exceeded:

- Incremental Lifetime Cancer Risk < 1X10-5;
- Hazard Index < 1; and
- Blood lead levels < 10 micrograms per deciliter (ug/dl).

CLOSING

This summary has been provided to document the results of environmental monitoring and removal action activities conducted to date at the former Sunkist Citrus Processing Plant in Ontario, California. In addition, a plan for a Site-specific HHRA program has been presented. Sunkist intends to proceed with the HHRA process immediately, as demolition activities are proceeding and the property is scheduled to be transferred to the City of Ontario as soon as demolition and any necessary remedial actions have been completed. As such, Sunkist is requesting that HMD, and RWQCB facilitate the review of the HHRA by contracting and coordinating with the Office of Environmental Health Hazard Assessment (OEHHA).

If you should have any questions regarding this summary, or the planned HHRA, please do not hesitate to call.

Sincerely,

Brett H. Bowyer, P.G.

Principal

Bowyer Environmental Consulting, Inc.



Sunkist Ontario - Initial Response to Conditional Approval of RAP Brett Bowyer

to:

Carmen Santos 08/25/2011 12:24 PM

Cc:

Steve Armann, "Keith Rudd"

Hide Details

From: "Brett Bowyer"

 brettbowyer@bowyerenvironmental.com>

To: Carmen Santos/R9/USEPA/US@EPA

Cc: Steve Armann/R9/USEPA/US@EPA, "Keith Rudd" < krudd@sunkistgrowers.com>

2 Attachments





0825111_Figures [Compatibility Mode].pdf 08-23-2011 Stockpile Stats Summary Table.xls

Hello Carmen,

Per the EPA conditional approval of the RAP, we are sending you responses to specific comments (Comment No. 3 and No. 11) within the five day period specified. In addition, we are providing a response to Condition No. 14, as we need to proceed with the additional sampling of the non-PCB containing areas immediately in order to maintain the critical path on the demolition schedule. The original comments and our response are provided as follows.

3. Concrete stockpiles, statistical derivation of an additional number of concrete characterization samples. Within 5 days after the date of this approval, Sunkist/BEC must submit for USEPA approval the revised proposed number of additional concrete samples to be collected from each of several stockpiles (about 21) and building basements at the PCS. These stockpiles are listed in the attached table which is an excerpt from BEC's July 22, 2011 letter (Subject: Risk Assessment / RAP Review and Additional Action Items Former Sunkist Citrus Processing Plant...). Properly applied SW-846 statistical methodology shall be employed to calculate the number of additional concrete samples. The approved cleanup level of 4.5 mg/kg PCBs shall be used as the regulatory threshold (RT) instead of the 1 mg/kg RT used in the calculations presented in BEC's July 22, 2011 letter. Based on the above, USEPA is requiring that Sunkist/BEC conduct the following steps:

- a. Sunkist/BEC must use the existing data and the current version of ProUCL to separately calculate the distribution-specific 95% upper confidence limit (UCL) on the mean concentration for each stockpile. Stockpiles with UCLs above 4.5 mg/kg PCBs shall be disposed offsite to prevent any exposures to PCBs contained in the concrete from these stockpiles in the future.
- b. For the stockpiles not identified for disposal in Condition C.3.a ("the remaining stockpiles"), the existing concrete stockpile data may be insufficient as to justify onsite use of the remaining concrete. Sunkist/BEC must conduct additional sampling of those stockpiles. The existing data for the remaining stockpiles shall be used to derive the number of additional concrete characterization samples needed for each of the remaining stockpiles using the statistical method specified in SW-846 and a regulatory threshold of 4.5 mg/kg and not of 1 mg/kg. A random sampling approach shall be used to collect the additional concrete samples needed from each remaining stockpile.
- c. Sunkist/BEC shall use the existing PCB characterization data for the remaining stockpiles together with the new data (required in Condition C.3.b) and the current version of ProUCL to calculate a separate UCL for each remaining stockpile. Sunkist/BEC must dispose offsite any stockpiles with a UCL above the 4.5 mg/kg PCB cleanup level (regulatory threshold).

Sunkist/BEC proposed in Section 3.1 (PCB Removals) of the RAP to remove for offsite disposal the crushed concrete in Basement 21, and in stockpiles W-N, D, 10, 16, 17, and 18 (including 18a and 18b). USEPA approves the offsite disposal of the concrete in Basement 21 and in the mentioned stockpiles in context to the approved PCB cleanup level of 4.5 mg/kg.

Sunkist/BEC is in agreement with this comment and is providing the additional information and plans as part of this response. Please note that following the additional sampling of the crushed concrete stockpiles per the previously submitted plan (BEC, July 22, 2011), Sunkist made a decision to remove select stockpiles from the Site that we believed would not meet the revised cleanup criteria. The removed crushed concrete stockpiles included, Stockpiles 10, 14, 15, 16, 17 and W-N. In addition, the crushed concrete in Basement 21 is in the process of being removed from the Site. All of this material is being properly disposed of off-Site. Documentation regarding the disposed volumes and disposal facility information will be provided in the Completion Report. The approximate former location of these stockpiles, and of the remaining stockpiles and filled basements are shown on the attached Figure 1.

As per the requirements specified above, BEC performed additional statistical evaluations for the remaining twelve stockpiles of crushed concrete (Stockpiles 11, 12, 13, 18, 19, 20, 21, A, B, C, D and W-S) and two filled basements (Basement 11 and 64). This evaluation was performed per the methods specified in SW-846 (utilizing the 4.5 mg/kg cleanup value as the regulatory threshold, and the specific data previously collected from each stockpile and/or basement) to determine the appropriate number of additional samples necessary to complete the characterization of each of the stockpiles and/or basements. The evaluation is provided in attached spreadsheet. As shown, the re-evaluation of the stockpiles specific data utilizing 4.5 mg/kg as the regulatory threshold found that sufficient data was available to characterize each of the stockpiles/basements except for Stockpile D. The SW-846 evaluation determined that thousands of samples would need to be collected from Stockpiles D in order to complete the characterization. In addition, based on the current dataset, the ProUCL calculation for Stockpile D is 6.35 mg/kg. Given these conditions, it has been decided that Stockpile D will be disposed of off-Site. Documentation regarding the final deposition of Stockpile D will be provided in the Completion Report.

An evaluation of the UCL for Stockpiles 11, 12, 13, 18, 19, 20, 21, A, B, C, and WS, and for Basement 11 and 64 has been conducted, as provided in the attached spreadsheet. As shown the ProUCL estimate for each of these stockpiles and basements is less than the approved 4.5 mg/kg cleanup

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value. Based on the additional evaluations conducted here, Stockpiles 11, 12, 13, 18, 19, 20, 21, A, B, C and W-S will be utilized to fill low spots and as road base on the Site.

11. Extraction and analytical methods. Field and laboratory quality control samples. Under the TSCA PCB regulations the applicant has the option to choose either the Soxhlet extraction method (USEPA Method 3540C) or the Ultrasonic method (USEPA Method 3550C). The Soxhlet extraction method is preferred by USEPA or both concrete and soil samples. If necessary, post extraction and pre-analysis sample cleanup (e.g., USEPA Methods 3665A [sulfuric acid], 3620C [florisil column], 3640A [Gel Permeation Column, GPC]) procedures must be considered if matrix interferences are suspected that could increase analytical method detection limits and compromise comparisons of analytical results to the cleanup levels required in this approval.

Within five (5) days after the date of this approval and before starting sampling at the PCS Sunkist/BEC shall submit a description of quality control (QC) procedures that will be implemented in the field during sample collection (characterization and cleanup verification sampling) and number and type of field QC (e.g., duplicates) samples to be collected for soil and concrete. This description shall also identify the laboratory QC samples (i.e., surrogate spikes, matrix spikes, equipment blanks) that will be prepared and analyzed by the contracted analytical laboratory together with the site samples.

Agreed and Noted. As specified in the Sampling and Analysis Plan (SAP) that was submitted (Appendix D) as part of the RAP (BEC, May 22, 2011) the following QA/QC samples will be collected:

- Field Duplicates Field duplicate samples will be collected at a minimum frequency of 1 for every 20 samples collected. Duplicate samples will be independently collected as close as possible to the original sample from the same source under identical sampling conditions.
 The field duplicate samples will be uses to document sampling and analytical precision.
- Equipment Rinsate Blanks Equipment rinseate blanks will be collected to evaluate field sampling and decontamination procedures by pouring water (for soil and stockpile sampling) or hexane (for porous material sampling) over the decontaminated equipment, following sample collection. In general, equipment blanks will be collected at a rate of 1 in 20 (minimum of one per day).
- Matrix Spike and Matrix Spike Duplicate (MS/MSD) In general, for every 20 field samples, one location will have sample volume collected in triplicate and will be designated on the chain-of-custody form as an MS/MSD.
- Surrogate Analysis ABC will analyze surrogates with each of the analyses performed. For the 8082 analysis, the laboratory utilizes 2,4,5,6-tetrachloro-m-xylene and decachlorobihenyl as surrogates. The recoveries of these compounds will be reported on the laboratory reports.
- 12. Areas investigated for non-PCB contamination (Section 4.3 [Non-TSCA Related Soil Removal Activities] of the RAP). Sunkist/BEC have indicated the source of PCBs at the Sunkist Site is unknown. Investigations for non-PCB contaminants have occurred in Area 24C, Area D-5-1, Area L-13-3, Area B-5-1, and Area D-1-1 (collectively referred to as "Non-PCB Areas") and petroleum hydrocarbons and polyaromatic hydrocarbons (PAHs) are present at some of these areas. Given Sunkist's uncertainty on the source of PCBs and the presence of PAHs and petroleum hydrocarbons, USEPA is requesting that cleanup verification sampling to be conducted in the "Non-PCB Areas" include testing for PCBs. Within 15 days after the date of this letter propose the number of soil samples that Sunkist/BEC will collect to demonstrate PCBs are not present in the "Non-PCB Areas" in concentrations above the USEPA-approved PCB cleanup level.

 The non-PCB areas were relatively small and all but one of these areas (24C) had one or two previous samples collected and analyzed for PCBs. The results of the previous analyses, along with plans for additional sample collection and analysis are provided on the attached Figures 2 through 6. Please concur or provide comment on these proposed plans as soon as possible, as the sampling will need to occur this week in order to maintain our schedule.

Thank you.

Brett Bowyer, P.G. Bowyer Environmental Consulting, Inc. 17011 Beach Boulevard, Suite 900 Huntington Beach, CA 92647

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Bowyer Environmental Consulting



July 22, 2011

VIA ELECTRONIC MAIL

Ms. Carmen Santos Waste Management Division U.S. Environmental Protection Agency Region 9 75 Hawthorne Street San Francisco, CA 94105

Subject:

Risk Assessment/RAP Review and Additional Action Items

Former Sunkist Citrus Processing Plant

616 E. Sunkist Street Ontario, California

Dear Ms. Santos:

Thank you for spending time with us on the phone on Wednesday (July 20, 2011) in review of the Human Health Risk Assessment (Risk Assessment) and Remedial Action Plan (RAP) associated with the former Sunkist Growers, Inc. (Sunkist) Citrus Processing Plant located at 616 E. Sunkist Street in Ontario, California (Site). This letter summarizes the discussions and reviews actions to be taken in the near future. As you know, it is critical that all necessary remedial actions are conducted and that the site is closed (from and environmental standpoint) by the end of September in order for the property sale to be completed by the end of October 2011.

The following issues were discussed during our call, or are additional critical issues that need to be completed in order to meet the project time frame.

1. Dust dispersion was evaluated in the Risk Assessment via a simple Gaussian analytical method, which in our opinion results in a conservative, worst-case exposure condition. Patrick Wilson indicated that the EPA has

Ms. Carmen Santos June 22, 2011 Page 2

preferred air dispersion models. However, we believe that these models would result in a lower exposure condition, given that the models consider factors (dispersion and dilution) that were not considered in the simple analytical method that we employed. It was agreed that Patrick Wilson would do a quick evaluation of the exposure condition against the EPA models to validate that our analytical tool is conservative (i.e.: predicts the worst-case exposure condition).

- 2. The EPA is requiring a re-submittal of the evaluation of the PCB cleanup criteria within the risk assessment. In particular, EPA is requiring that the assumption that a construction worker/utility worker is exposed to crushed concrete 50% of the time during a standard associated exposure scenario (one year) is changed to 100%. We believe this is an overly conservative assumption given that there is only about 30,000 cubic yards (cys) of crushed concrete at the Site, and that it is not reasonable that a construction/utility worker would be exposed to 100-percent crushed concrete over his/her time at the Site. However, based on the current data set, we do not believe that the proposed scope in the RAP will change based on this re-evaluation. As a result, we have completed the re-evaluation and it is provided in Attachment A.
- Statistical analysis of crushed concrete EPA asked that each basement and/or stockpile of crushed concrete is to be evaluated separately to determine if it exceeds the revised cleanup level. In order to determine the number of valid samples necessary to meet the requirements of SW-846, the following assessment was made.
 - a. The number of samples to be taken to characterize crushed concrete piles was calculated using the methodology recommended in Chapter 9 of SW-846. Chapter 9 defines the appropriate number of samples as the least number of samples required to generate a sufficiently precise estimate of the true mean (μ) concentration of total PCBs in the crushed concrete. In other words, the least number of samples needed to demonstrate that the upper limit of the confidence interval (CI) for μ is less than the regulatory threshold (RT) for PCBs in soil. An RT of 1 milligram per kilogram (mg/kg) was chosen for this analysis as this level is a well-established regulatory threshold for porous media in high-occupancy areas (40 CFR 761.61(a)(3)(i)(C).

Ms. Carmen Santos June 22, 2011 Page 3

b. The formula for estimating the minimum number of samples required to characterize solid waste (Table 9-1, Equation 8, Chapter 9 of SW-846) indicates that increased sampling effort is generally justified as the data variability increases and the difference between the RT and the sample mean concentration decreases. For this evaluation, the mean, standard deviation and variability of the sample data from the existing piles were obtained using ProUCL (version 4.1) software. Parameters and statistics used in the calculation of the appropriate number of samples to collect from each crushed concrete stockpile are presented below.

<u>Parameter</u>	<u>Value</u>
Degrees of freedom (df) =	24
Student's "t" value (t) =	1.318
Standard deviation (s) =	4.378
Sample mean conc. =	4.112
Variance = (s^2)	19.17
Regulatory threshold (RT) =	1
Delta =	-3.112
Appropriate number of samples to	
collect from solid waste (n) =	3.44

As shown, based on the SW-846 methodology a minimum of four samples (roundup value from the estimated 3.44) need to be collected from each basement and/or stockpile. However, in order to calculate the 95% UCL using ProUCL (version 4.1) a minimum of 6 samples need to be collected from each basement and/or stockpile. As such the following number of additional samples will be collected:

Location	# of Samples Previously Collected	# of Additional Samples to be Collected	95% UCL	
Basement 11	6	0	4.008 mg/kg	
Basement 21	11	0	15.18 mg/kg	
Basement 64	13	0	3.072 mg/kg	
Stockpile W-N	2	4	To be Determined*	
Stockpile W-S	2	4	To be Determined*	
Stockpile A	1	5	To be Determined*	
Stockpile B	3	3	To be Determined*	
Stockpile C	2	4	To be Determined*	
Stockpile D	3	3	To be Determined*	
Stockpile 10	1	5	To be Determined*	
Stockpile 11	1	5	To be Determined*	
Stockpile 12	1	5	To be Determined*	
Stockpile 13	1	5	To be Determined*	
Stockpile 14	1	5	To be Determined*	
Stockpile 15	1	5	To be Determined*	
Stockpile 16	1	5	To be Determined*	
Stockpile 17	1	5	To be Determined*	
Stockpile 18	1	5	To be Determined*	
Stockpile 19	1	5	To be Determined*	
Stockpile 20	1	5	To be Determined*	
Stockpile 21	1	5	To be Determined*	

Note: * 95% UCL to be calculated after collecting additional samples.

The additional samples will be collected by gridding the stockpiles into approximately 20 equal volume areas. The stockpile sub-areas to be sampled will be randomly selected from the 20 equal volume areas. At

Ms. Carmen Santos June 22, 2011 Page 5

each of the chosen sampling sub-areas, samples will be collected from the approximate center of the sub-areas. An excavator and/or backhoe will be used to expose the approximate centroid of each sampling sub-area. Samples will be obtained in laboratory provided glass jars with Teflon seals. The samples will be delivered to the ABC Environmental Laboratory (ABC) in Ontario, California. Each of the samples will be analyzed for polychlorinated biphenyls (PCBs) by EPA Method 8082.

4. Congener Analysis – The congener tests were conducted by Pace Analytical in Late March early April of 2011 via EPA Method 1668A. As shown on the attached (Attachment B) revised analytical reports, the results were compared to the Method 1668C criteria. As stated in the attached, the analytical approach used for Method 1668A does not change upon migration to 1668C (only the acceptance criteria are different). Pace reprocessed the data using the 1668C criteria and only minimal changes occurred. Those changes were the removal of one "R" flag from a method blank, and the addition of an "R" flag to LCS-28536, LCS-28552 and LCSD-28553. As such, the analytical results did not change and the subsequent risk evaluation (BEC, June 24, 2011) will not need to be modified.

Additionally, it should be noted that the specific congener testing was approved by EPA in March of 2011, per the attached (Attachment C). At that time, no specific request for the 1668C methodology was made by the EPA and almost all laboratories were (and still are) using Method 1668A. The EPA did first publish Method 1668C in March of 2010. However, only the proposed rule was published in the Federal register in September 2010, and it is our understanding that a final rule has not yet been promulgated. As of April, 2011 (the time frame associated with the congener testing program conducted for this project) there was still many question regarding the 1668C method that had not been addressed. It was reasonable at the time that this work was conducted to utilize EPA Method 1668A, given the status of the new methods implementation and the lack of specific direction from the EPA at that time to utilize Method 1668C.

In any event, as stated previously, based on the re-evaluation of the data by Pace based on Method 1668C procedures, the results obtained on these samples are representative and the subsequent risk evaluation is representative.

- 5. Building 12 and 15 Uncrushed but Broken Concrete Data of pre-demo porous media sampling has been included on Table 2-16 of RAP. Please note that three areas of impacted concrete were cut out and have been stockpiled separately for off-Site disposal. The areas that were cut out encompass samples B12-U (4.9 mg/kg of aroclor 1254), BSW-B12 (26.1 mg/kg of aroclor 1254) and LD-L1 (28.2 mg/kg of aroclor 1254). All other pre-demo, porous media samples collected from buildings 12 and 15 were less than 1.0 mg/kg. Additional sampling was conducted from the five stockpiles of other non-crushed concrete that were generated after the impacted areas were removed. The methods and sampling results associated with this additional stockpile sampling is presented in the RAP, and results are also summarized on Table 2-16 of the RAP. As shown the results indicate very low PCB concentrations (highest level was 0.0282 mg/kg of aroclor 1254). As discussed during our call, crushing of this material is scheduled to begin at the beginning of next week (July 25, 2011).
- 6. Wastewater Treatment Plant (WWTP) Porous Media Sampling Sampling was conducted on June 23, 2011. The data is being evaluated and a summary report is being prepared. The report will include figures showing the sampling locations and tables summarizing the data. In addition, plans to remove any elevated areas of impacted material will be provided, if necessary. The report will be provided by July 28, 2011. Demolition of the foundations for the WWTP is current scheduled to begin on August 5, 2011.
- 7. Building 31 Demolition The EPA needs to review the porous media data collected from Building 31 (submitted as part of the RAP) to assess if sufficient data has been collected so that demo can proceed on Building 31.
- 8. Dust suppression and monitoring procedures Submitted to EPA on June 27, 2011.
- 9. In addition to the PCB cleanup level, the risk assessment also evaluated cumulative Incremental Lifetime Cancer Risk (ILCR) and Hazard Index (HI) levels associated with all chemicals found to be present at the Site. As presented in the risk assessment and RAP, the removal of diesel-range hydrocarbons at concentrations in excess of diesel-range hydrocarbons in three areas (AOC B-5-1, AOC D-1-1 and Lift L-13) and PAHs in one area (AOC D-5-1) along the removal of PCBs will result in acceptable ILCR and HI levels based on the future property use (commercial/industrial). The

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County of San Bernardino, which is the lead agency for the non-PCB-related cleanup activities, agreed with the findings of the risk assessment and RAP. A copy of the County's review and approval of these documents is provided in Appendix D. Based on this approval, the non-PCB related cleanup activities (soil excavation and confirmation soil sampling) in the diesel-range hydrocarbon and PAH impacted areas are underway.

Please contact us at 877-232-4620 if you have any comments or questions about this supplemental risk evaluation.

Sincerely,

Heriberto Robles, Ph.D., D.A.B.T.

Senior Technical Consultant

J.J. Ren

Bowyer Environmental Consulting, Inc.

Brett H. Bowyer, P.G.

Principal

Bowyer Environmental Consulting, Inc.

Attachment A

Derivation of Risk-Based Cleanup Levels for PCBs in Crushed

Bowyer Environnemental Consulting

17011 Beach Blvd., Suite 900 Huntington Beach, CA 92647 (877) 232-4620 (714) 840-4963 (fax)



Derivation of Risk-Based Cleanup Levels for PCBs in Crushed Concrete Addendum

To:

Brett Bowyer

From: Heriberto Robles

CC:

Keith Rudd

Date: 7/22/2011

This memorandum has been prepared to summarize the derivation of Risk-Based Cleanup Levels (RBCLs) for polychlorinated biphenyl (PCB) detected at the Sunkist Citrus Processing Plant (Site). The derivation provides RBCLs for PCB detected in crushed concrete and for the protection of future nonintrusive and construction workers at the Site. This version of the derivation incorporates specific requests that were made by the United States Environmental Protection Agency (EPA) during our call on July 20, 2011. The original derivation was provided in the Risk Assessment - Soil and Crushed Concrete (Risk Assessment), which was prepared by Bowyer Environmental Consulting, Inc. (BEC) on April 8, 2011.

Results of the Risk Assessment indicate that, in the absence of Site remediation, PCBs may be present in crushed concrete at concentrations that could pose a health hazard to future onsite workers. In anticipation of site remediation activities, RBCLs for PCBs were developed for the Site. RBCLs are media-specific (soil or crushed concrete) concentrations that are believed to be protective of human health and the environment.

RBCLs for the Site were developed using EPA (USEPA 1991) methodology and development criteria. Essentially, the equations used to estimate RBCLs involve the reverse of the calculation procedure used for the health risk assessment. Given a target risk limit at the exposure points, the maximum allowable concentration at the source zone is back calculated based on the applicable exposure factors and toxicity parameters.

The development of RBCLs PCBs in crushed concrete required the following data:

Identification of potentially exposed population(s) and exposure route(s) based on the most probable future land use.

 Calculation of an acceptable daily PCB exposure level and an acceptable incremental cancer risk and hazard index.

The potentially exposed populations are assumed to be future onsite nonintrusive and construction workers. The potential exposure pathways include inhalation of dust particles, and oral and dermal contact with PCB-impacted crushed concrete. Exposure parameters used to characterize onsite nonintrusive and construction workers are presented in Table 1. It should be noted that the derivation of RBCLs assume that onsite workers are exposed only to crushed concrete (i.e., 100 percent exposure while at the Site; Table 1).

RBCLs for the protection of cancer effects were calculated by setting the target risk at the acceptable level for California workers of ten-in-a-million cancer risk (1E-05) and then solving for the concentration variable using the previously estimated incremental cancer risk associated with crushed concrete. The following equation defines the relationship between RBCLs, exposure point concentrations and cancer risk:

$$RBCLs = EPC \times \frac{TR}{Chemical - Specific & Site - Specific CR}$$

Where:

RBCL = Risk-based cleanup level (mg/kg)

EPC = PCB exposure point concentration used in the risk calculation (mg/kg).

TR = Target risk limit for carcinogenic effects (1E-05; unitless)

CR = Incremental cancer risk estimated to be associated with the site-specific exposure point concentration (unitless)

PCB-specific and site- specific cancer risks posed by detected PCB to future onsite workers were estimated using the risk assessment methodology, parameters and assumptions described in the Human Health Risk Assessment (HHRA) prepared for the Site (BEC, 2011). Specifically, CR posed by PCBs in crushed concrete were derived using the same

methodology as that described in the HHRA for the evaluation of Aroclor-1254 detected in crushed concrete.

RBCLs for the protection of non-cancer effects were set by choosing an acceptable hazard index for the Site and then solving for a PCB concentration in crushed concrete that meets the chosen hazard index. The equation that defines the relationship between exposure point concentration, hazard index and RBCLs is:

$$RBCL = EPC \times \frac{TQI}{Chemical - Specific \& Site - Specific HQ}$$

where:

TQI = Target hazard quotient for noncarcinogenic effects (1.0; unitless)

HQ = Hazard quotient estimated to result from multipathway exposures at site-specific exposure point concentrations (unitless).

All other as previously defined.

The target hazard quotient (*TQI*) chosen was 1.0 (USEPA, 1991).

Calculation of RBCLs for protection against cancer effects and exposures through inhalation, incidental ingestion, and dermal contact with crushed concrete are presented in Table 2. Supporting calculations are presented in Tables 3 through 5.

Calculation of RBCLs for protection against noncancer effects and exposures through inhalation, incidental ingestion, and dermal contact with crushed concrete are presented in Table 6. Supporting calculations are presented in Tables 7 through 9.

Results of this supplemental evaluation indicate that a PCB concentration of 4.5 milligrams per kilogram (mg/kg) in crushed concrete is protective of future onsite workers since exposure to PCBs at these level is not expected to result in cancer and noncancer effects in excess of California regulatory limits.

References

- 1. Bowyer Environmental Consulting (BEC). 2011. Risk Assessment, Soil and Crushed Concrete. Former Sunkist Citrus Processing Plant, 616 East Sunkist Boulevard, Ontario, California. April.
- 2. U.S. Environmental Protection Agency (USEPA). 1991. Risk Assessment Guidance for Superfund: Volume I Human Health Evaluation Manual (Part B, Development of Risk-Based Preliminary Remediation Goals). Office of Emergency and Remedial Response. Washington, D.C.

Table 1
Exposure Parameters for Onsite Receptors
Crushed Concrete Exposure Scenario
616 Sunkist Street
Ontario, California

		Worker Exposure Parameters				
Exposure/Site Specific Parameters	Units	Outdoor Nonintrusive	Construction	Source		
Soil Ingestion Rate (IR-S)	mg/day	100	330	USEPA 2010		
Skin Surface Area (SA)	cm²/day	3,300	3,300	USEPA 2010		
Skin Adsorption Factor (ABS)	unitless	chem-specific	chem-specific	DTSC 1994/EPA 1997		
Adherence Factor (AF)	mg/cm ²	0.20	0.30	USEPA 2010		
Fraction of Soil Exposed (FE)	unitless	, 1	1	USEPA 2010		
Inhalation Rate of Air (IR-A)	m³/day	20	20	USEPA 2010		
Exposure Frequency (EF)	days/year	250	250	USEPA 2010		
Exposure Frequency (dermal; EFd)	days/year	250	250	USEPA 2010		
Exposure Duration (ED)	years	25	1	USEPA 2010 / Default		
Conversion Factor (CF)	kg/mg	1.0E-06	1.0E-06			
Body Weight (BW)	kg	70	70	USEPA 2010		
Averaging Time for Noncarcinogens	days	9,125	365	USEPA 1989 (ED*365 days/yr)		
Averaging Time for Carcinogens (AT	days	25,550	25,550	USEPA 1989		

Table 2
Cumulative Cancer Risks from Multipathway Exposure
Crushed Concrete Exposure Scenario
616 Sunkist Street
Ontario, California

COPC	Exposure Point Conc. (mg/kg)	Worker Exposure Scenario							
		O Ingestion		onintrusiv Inhalation		Ingestion		truction Inhalation	Total Risl
<i>PCBs</i> Aroclor 1254	4.5	3.1E-06	2.9E-06	1.1E-09	6.1E-06	4.2E-07	1.7E-07	4.3E-11	5.9E-07
Total Cancer Ris	k				6.1E-06				5.9E-07

Notes: "nd" not detected; "--" not applicable or not available; " * " chemical not a COPC for combined soil

Table 3
Cancer Risks from Incidental Ingestion
Crushed Concrete Exposure Scenario
616 Sunkist Street
Ontario, California

	Exposure	Oral	1 88 8 8 8 Worker Exposure Scenario 1998 1 €							
COPC	Point Concentration (mg/kg)	Slope Factor (mg/kg-d) ⁻¹	N 20	Daily Intake kg-d) Const.	Cancer (Unitle Outdoor Nonintru.					
<i>PCBs</i> Aroclor 1254	4.5	2.0E+00	1.6E-06	2.1E-07	3.1E-06	4.2E-07				
Total Cancer Risk	1				3.1E-06	4.2E-07				

Equations:

Industrial Worker INTAKE_{cancer} (mg/kg-day) = ((CS * IR-Siw * FE * EFiw * Ediw * CF) / (BWiw * AT_{cancer})) INTAKE_{cancer} (mg/kg-day) = ((CS * IR-Scw * FE * EFcw * EDcw * CF) / (BW_{cw} * AT_{cancer}))

Cancer Risk = (INTAKE_{cancer} * CSF)

Table 4
Cancer Risks from Dermal Contact
Crushed Concrete Exposure Scenario
616 Sunkist Street
Ontario, California

	Exposure	Soil-to-Skin	Oral/Dermal	Worker Exposure Scenario							
COPC	Point Concentration	Absorption Factor	Slope Factor	Average Da (mg/k	Martin Commercial (4)	Cancer (Unit)					
	(mg/kg)	(unitless)	(mg/kg-d) ⁻¹	Outdoor Nonintru.	Const.	Outdoor Nonintru.	Const.				
<i>PCBs</i> Aroclor 1254	4.5	0.14	2.0E+00	1.5E-06	8.7E-08	2.9E-06	1.7E-07				
otal Cancer R	isk					2.9E-06	1.7E-07				

Industrial Worker INTAKE_{cancer} (mg/kg-day) = ((CS * SAiw * AFiw * ABS * FE * EFiw * EDiw * CF) / (BWiw * AT_{cancer}))

Construction Woi INTAKE_{cancer} (mg/kg-day) = ((CS * SAcw * AFcw * ABS * FE * EFcw * EDcw * CF) / (BWcw * AT_{cancer}))

Cancer Risk = (INTAKE_{cancer} * CSF)

Page 1 of 1 072211_Tables/4/7/22/2011

Table 5
Cancer Risks from Inhalation of Outdoor Air
Crushed Concrete Exposure Scenario
616 Sunkist Street
Ontario, California

To the second	Exposure	PEF	Inhalation Slope Factor	Worker Exposure Scenario						
COPC	Point Concentration	or VF		Average Da (mg/k	5.85.5	Cancer Risk (Unitless)				
	(mg/kg)	(m3/kg)	(mg/kg-d) ⁻¹	Outdoor Nonintru.	Const.	Outdoor Nonintru.	Const.			
<i>PCBs</i> Aroclor 1254	4.5	5.89E+08	2.0E+00	5.3E-10	2.1E-11	1.1E-09	4.3E-11			
otal Cancer R	isk			.414-7		1.1E-09	4.3E-11			

Industrial Work INTAKE_{cancer} (mg/kg-day) = (CS * EFiw * EDiw * (1/PEF) * IR-Aiw) / (BWiw * AT_{cancer}))
Construction W INTAKE_{cancer} (mg/kg-day) = (CS * EFcw * EDcw * (1/PEF) * IR-Acw) / (BWcw * AT_{cancer}))
Cancer Risk = (INTAKE_{cancer} * CSF)

Page 1 of 1 072211_Tables/5/7/22/2011

Table 6
Cumulative Health Hazards from Multipathway Exposure
Crushed Concrete Exposure Scenario
616 Sunkist Street
Ontario, California

	Exposure		Worker Exposure Scenario										
COPC	Point Conc. (mg/kg)	\$1.00 \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	2000 Ser 152 100 10000	Ionintrusive Inhalation		Ingestion	6 J. Brenn, Dec. 98800 3	truction Inhalation	uction Inhalation Total HI				
PCBs Aroclor 1254	4.5	2.2E-01	2.0E-01	NA	4.2E-01		3.1E-01		1.0E+00				
otal Hazard Inc	lex				4.2E-01				1.0E+00				

Table 7
Health Hazards from Incidental Ingestion
Crushed Concrete Exposure Scenario
616 Sunkist Street
Ontario, California

	Exposure	Oral	Worker Exposure Scenario							
COPC	Point Concentratior (mg/kg)	Reference Dose (mg/kg-d)		Daily Intake kg-d) Const.	Hazard C (Unitl Outdoor Nonintru.					
PCBs Aroclor 1254	4.5	2.0E-05	4.4E-06	1.5E-05	2.2E-01	7.3E-01				
Total Hazard Index					2.2E-01	7.3E-01				

Equations:

Industrial Worker

 $\mathsf{INTAKE}_{\mathsf{noncancer}} \, (\mathsf{mg/kg\text{-}day}) = ((\mathsf{CS} \, * \, \mathsf{IR}\text{-}\mathsf{iw} \, * \, \mathsf{FE} \, * \, \mathsf{EFiw} \, * \, \mathsf{EDiw} \, * \, \mathsf{CF}) \, / \, (\mathsf{BWiw} \, * \, \mathsf{AT}_{\mathsf{noncancer}}))$

Construction Worker

INTAKEnoncancer (mg/kg-day) = ((CS * IR-Scw * FE * EFcw * EDcw * CF) / (BWcw * ATnoncance

Noncancer Hazard = (INTAKE_{noncancer} / RfD)

Table 8
Health Hazards from Dermal Contact
Crushed Concrete Exposure Scenario
616 Sunkist Street
Ontario, California

	Exposure	Soil-to-Skin	Oral/Dermal	Worker Exposure Scenario							
COPC	Point Concentration	Absorption Factor	Reference Dose	Average D (mg/k Outdoor	See	Hazard Q (Unitle Outdoor					
	(mg/kg)	(unitless)	(mg/kg-d)	Nonintru.	Const.	Nonintru.	Const.				
PCBs Aroclor 1254	4.5	0.14	2.0E-05	4.1E-06	6.1E-06	2.0E-01	3.1E-01				
otal Hazard Inc	dex					2.0E-01	3.1E-01				

Equations:

Industrial Worker INTAKE_{noncancer} (mg/kg-day) = ((CS * SAiw * AFiw * ABS * FE * EFiw * EDiw * CF) / (BWiw * AT_{noncancer});
Construction Wo INTAKE_{noncancer} (mg/kg-day) = ((CS * SAcw * AFcw * ABS * FE * EFcw * EDcw * CF) / (BWcw * AT_{noncancer});

Noncancer Hazard = (INTAKE_{noncancer} / RfD)

Table 9
Health Hazards from Inhalation of Outdoor Air
Crushed Concrete Exposure Scenario
616 Sunkist Street
Ontario, California

	Exposure	PEF	Inhalation		Worker Expos	ure Scenario	ta int
COPC	Point Concentration (mg/kg)	or VF (m³/kg)	Reference Dose ^a (mg/kg-d)	0.00	Daily Intake /kg-d) Const.	Hazard Qı (Unitle Outdoor Nonintru.	
<i>PCBs</i> Aroclor 1254	4.5	5.9E+08	NA	1.5E-09	1.5E-09	NA	NA
Total Hazard Index		57.5	<u> </u>			0.0E+00	0.0E+00

Particulate Equations:

Industrial Worker INTAKE_{noncancer} (mg/kg-day) = (CS * EFiw * EDiw * (1/PEF) * IR-Aiw) / (BWiw * AT_{noncancer}))

Construction Worker INTAKE_{noncancer} (mg/kg-day) = (CS *EFcw * EDcw * (1/PEF) * IR-Acw) / (BWcw * AT_{noncancer}))

Noncancer Hazard = (INTAKE_{noncancer} / RfD)

Attachment B

Revised Laboratory Results – Congener Analysis



Pace Analytical Services, Inc.

1700 Elm Street Minneapolis, MN 55414 Phone: 612 607 1700

Phone: 612.607.1700 Fax: 612.607.6444

Report Prepared for:

Brett Bowyer
Bowyer Environmental Consulting
17011 Beach Blvd
Huntington Beach CA 92647

REPORT OF LABORATORY ANALYSIS FOR PCBs

Report Information:

Pace Project #: 10153174

Sample Receipt Date: 03/31/2011

Client Project #: 08010007

Client Sub PO #: N/A State Cert #: 01155CA

Invoicing & Reporting Options:

The report provided has been invoiced as a Level 2 PCB Report. If an upgrade of this report package is requested, an additional charge may be applied.

Please review the attached invoice for accuracy and forward any questions to Scott Unze, your Pace Project Manager.

This report has been reviewed by:

July 21, 2011

Scott Unze, Project Manager

(612) 607-6383

(612) 607-6444 (fax)

scott.unze@pacelabs.com



Report of Laboratory Analysis

This report should not be reproduced, except in full, without the written consent of Pace Analytical Services, Inc.

The results relate only to the samples included in this report.

Report Prepared Date:

July 14, 2011



Pace Analytical Services, Inc. 1700 Elm Street

1/00 Elm Street Minneapolis, MN 55414 Phone: 612.607.1700

Fax: 612.607.6444

DISCUSSION

This report was revised after evaluation of the results as compared to the Method 1668C criteria. The analytical approach used for Method 1668A does not change upon migration to 1668C, only the acceptance criteria are different. These results were re-processed using the 1668C criteria and only minimal changes occurred. Those changes were the removal of one "R" flag from the method blank and the addition of one "R" flag to LCS-28536.

This report presents the results from the analyses performed on three samples submitted by a representative of Bowyer Environmental Consulting. The samples were analyzed for the presence or absence of selected polychlorobiphenyls (PCBs) using a modified version of USEPA Method 1668. Reporting limits were set to 50 ng/Kg. The samples were received above the recommended temperature range of 0-6 degrees Celsius.

The recoveries of the isotopically-labeled PCB internal standards in the sample extracts ranged from 45-92%. With the exceptions of five low values in the associated quality control samples, which were flagged "R" on the results tables, the labeled standard recoveries obtained for this project were within the target ranges specified in Method 1668. Also, since the quantification of the native congeners was based on isotope dilution, the data were automatically corrected for variation in recovery and accurate values were obtained.

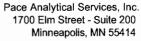
In some cases, interfering substances impacted the determinations of native or labeled PCB congeners; the affected values were flagged "I" where incorrect isotope ratios were obtained. Values above the calibration range were flagged "E" and should be regarded as estimates.

A laboratory method blank was prepared and analyzed with the sample batch as part of our routine quality control procedures. The results show the blank to be free of the target PCB congeners at the reporting limits. These results indicate that the sample processing steps did not contribute significantly to the levels reported for the field samples.

Laboratory spike samples were also prepared with the sample batch using clean sand that had been fortified with native standard materials. The results show that the spiked native compounds were recovered at 61-108%, with relative percent differences of 1.0-7.9%. These results were all within the target ranges for this method. Matrix spikes were not prepared with the sample batch.

REPORT OF LABORATORY ANALYSIS

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Minnesota Laboratory Certifications

Authority	Certificate #	Authority	Certificate #
Alabama	40770	Montana	92
Alaska	MN00064	Nebraska	
Arizona	AZ0014	Nevada	MN000642010A
Arkansas	88-0680	New Jersey (NE	MN002
California	01155CA	New Mexico	MN00064
Colorado	MN00064	New York (NEL	11647
Connecticut	PH-0256	North Carolina	27700
EPA Region 5	WD-15J	North Dakota	R-036
EPA Region 8	8TMS-Q	Ohio	4150
Florida (NELAP	E87605	Ohio VAP	CL101
Georgia (DNR)	959	Oklahoma	D9922
Guam	959	Oregon (ELAP)	MN200001-005
Hawaii	SLD	Oregon (OREL	MN200001-005
Idaho	MN00064	Pennsylvania	68-00563
Illinois	200012	Saipan	MP0003
Indiana	C-MN-01	South Carolina	74003001
Indiana	C-MN-01	Tennesee	2818
lowa	368	Tennessee	02818
Kansas	E-10167	Texas	T104704192-08
Kentucky	90062	Utah (NELAP)	PAM
Louisiana	LA0900016	Virginia	00251
Maine	2007029	Washington	C755
Maryland	322	West Virginia	9952C
Michigan	9909	Wisconsin	999407970
Minnesota	027-053-137	Wyoming	8TMS-Q
Mississippi	MN00064		

REPORT OF LABORATORY ANALYSIS

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Report No.....10153189

Appendix A

Sample Management

CHAIN-OF-CUSTODY / Analytical Request Document

The Chain-of-Custody is a LEGAL DOCUMENT. All relevant fields must be completed accurately.

Ref	www.pacelebs.com on A red Client Information;								1	\U)											į	019	;31	14	
Secti	on A	Section B				Section	an C		`															Page:	/ of	7
Bequi	red Client Information:	Desiring D	anto at turbo carreto a				Information	on:																. ogo. /		
Comp	Bourser Environmental Consults: 17011 Beach Blud. Suite 9	Report To:	Bouyer Enviro	ame	1	Attentio	on:	Cina	Bon	yer-														AGENC'		
Codre	17011 Beach Blud. Suite 9	Copy To:	BIETT BOW	45	• '	Compa	ny Name:	Bow	ger .	Envis	on me	Tel	Cor	7/نده	ring :	Tre.	-	FN	POES	Г	GROU	ND W	ATER	DRINK	ING WAT	ER
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Semail Semail	o brattbouger & bouger environmen	Purchase O	rder No.;			Pace C	uote Refe	rence:	400	ring Ta	· Be	**4,	CA	9	264	77		5	SITE		T	GA	T IL	IN F	WI F	, tC
Phone 777	NATING TON BEACL CA 92647 TO: bratt bourer & bourer environment 232 4620 714/840-4963 Sted Due Date/TAT:	Project Nam	e: Sunhist C	nto	110	Pace P	roject Mar	nager:										LOC	CATIO	NC	Г	ОН	r sc	L MI E	OTHER	CA
Reque	sted Due Date/TAT:			07		Pace F	rofile #:										F	ltere	d (Y/N)	77	7	777	777	11	
668	Section D Required Client Information	MATRIX	CODE	1	9		COLL	ECTED		-	S		Pre	eserva	tives		R	eque		7	77	7	//,	111	7	
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Client Name	9: <u>120W</u>	1ex		Project #	10153174
		1	_		
Courier: Fed Ex 7 UPS USPS CI Tracking #: 7 7 4 1/293/30	lent Com	mercia	l Pace Other	10,115 10,130	
Custody Seal on Cooler/Box Present: ye	8 12 no	Qaa	is intact: 🔲 yes 🗀		Timber 2
•		/			
	-	None	L. Other	Temp Blank: Yo	يري الساسكي
Thermometer Used 80344042 of 179428	Type of los				poling process has begun ale of person exemining
Cooler Temperature Temp should be above freezing to 6°C	Diological	1 199U	e is Frozen: Yes No Comments:	contente:	
Chain of Custody Present:	ØYes □No				
Chain of Custody Filled Out:	-EIYeg 🗆 No	DNA	2.		
Chain of Custody Relinquished:	1 Yes DNo		3.		
Sampler Name & Signature on COC:	□Yes ØNο	□NA	4.		
Samples Arrived within Hold Time:	TYOS ONO	DNA	5.	-	
Short Hold Time Analysis (<72hr):	□Yes ZINo	□N⁄A	6.		
Rush Turn Around Time Requested:	□Yes ☑No	□N/A	7.		
Sufficient Volume:	ØYes □No	□N⁄A	8.		
Correct Containers Used:	ÆYes □No	_ □N/A	9.		`
-Pace Containers Used:	□Yes □No	□N⁄A		·	· · · . · · . · . · . · . · . · . ·
Containers Intact:	DYes □No	□N/A	10.		
Filtered volume received for Dissolved tests	☐Yes ☐No	DAVA	11.		
Sample Labels match COC:	DY93 DNo	□N⁄A	12.		
-includes date/time/ID/Analysis Matrix:	フレ		1000	93 H2SO4 _	_ NaOH HCi
All containers needing acid/base preservation have been checked. Noncompliance are noted in 13.	□Yes □No	ZINA		¹⁰ □ ¹¹²⁹ 04 (NaOH D HO
All containers needing preservation are found to be in compliance with EPA recommendation.	□Yes □No	[ZNVA	Samp #		
•	Dva Dva		Initial when	Lot # of added	
Exceptions: VOA,Coliform, TOC, Oil and Grease, WI-DRO (water		_	completed	preservative	
Samples checked for dechlorination:	☐Yes ☐No		······································		<u> </u>
Headspace in VOA Vials (>6mm):	☐Yee ☐No				
Trip Blank Present:	□Yee □No				
Trip Blank Custody Seals Present	□Yee □No	ZINA			
Pace Trip Blank Lot # (if purchased):					
Client Notification/ Resolution:	,		2/21	Field Data Required	1? Y/N
Person Contacted: Byett 3) <i>-</i>	Date/	Time: 03/31/11		
Comments/ Resolution:			40 day - 11 - 11 - 11 - 11 - 11 - 11 - 11 -		
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Project Manager Review:	(w)			Date: /	3/31/11
•				ناطنتني	

Note: Whenever there is a discrepancy affecting North Carolina compliance samples, a copy of this form will be sent to the **Read Calculation**, inc. F-L213Rev.00, 05Aug2009 1700 Elm Street SE, Suite 200, Minneapolis, MN 55414



Reporting Flags

- A = Reporting Limit based on signal to noise
- B = Less than 10x higher than method blank level
- C = Result obtained from confirmation analysis
- D = Result obtained from analysis of diluted sample
- E = Exceeds calibration range
- l = Interference present
- J = Estimated value
- Nn = Value obtained from additional analysis
- P = PCDE Interference
- R = Recovery outside target range
- S = Peak saturated
- U = Analyte not detected
- V = Result verified by confirmation analysis
- X = %D Exceeds limits
- Y = Calculated using average of daily RFs
- * = See Discussion

Appendix B

Sample Analysis Summary



Method 1668 Polychlorobiphenyl Sample Analysis Results

Client - Bowyer Environmental Consulting

Client's Sample ID SPC-CC-16
Lab Sample ID 10153174001
Filename U110411A_04
Injected By CVS

Total Amount Extracted 11.0 g Matrix Solid % Moisture 5.5 Dilution 10

Dry Weight Extracted 10.4 g Collected 09/28/2010 ICAL ID U110312 Received 03/31/2011 10:05

CCal Filename(s) U110411A_01 Extracted 04/07/2011 19:15
Method Blank ID BLANK-28535 Analyzed 04/11/2011 10:01

PCB	Native Conc.	EMPC	EML	Equivalence ng/Kg	Spike	Labeled Analyte
Isomer	ng/Kg	ng/Kg	ng/Kg		Amount, ng	% Recovery
81 77 123 118 114 105 126 167 156 157 169 189	I 2130 D 7980 D 439000 ED 19200 D 235000 ED 590 D 24400 ED 75200 ED 17700 D ND 2900 D	2880	50.0 50.0 50.0 50.0 50.0 50.0 50.0 50.0	0.00000 0.21283 0.23937 13.15790 0.57526 7.04672 59.01484 0.73320 2.25702 0.53111 0.00000 0.08714		74 D 65 D 67 D 60 D 70 D 69 D 60 D 68 D 62 D 59 D 50 D

Total Equivalence 83.9 ng/Kg

Conc = Concentration

EML = Method Specified Reporting Limit (1668A)
EMPC = Estimated Maximum Possible Concentration

A = Reporting Limit based on signal to noise

E = Exceeds calibration range

I = Interference present

D = Result obtained from analysis of diluted sample

Results reported on a dry weight basis and are valid to no more than 3 significant figures.

Equivalence is calculated using WHO factors (2005)

REPORT OF LABORATORY ANALYSIS

Report No.....10153174_1668

ND = Not Detected

NA = Not Applicable

NC = Not Calculated



Method 1668 Polychlorobiphenyl Sample Analysis Results

Client - Bowyer Environmental Consulting

Client's Sample ID Lab Sample ID Filename

SPC-CC-39 10153174002 U110411A 05

Injected By **Total Amount Extracted** CVS 12.5 g

Matrix Dilution

Solid 10

% Moisture Dry Weight Extracted 7.9 11.5 g U110312

Collected Received

10/15/2010 03/31/2011 10:05 04/07/2011 19:15

ICAL ID

U110411A 01 CCal Filename(s) Method Blank ID **BLANK-28535**

Extracted Analyzed

44.9 ng/Kg

04/11/2011 10:34

PCB Isomer	Native Conc. ng/Kg	EMPC ng/Kg	EML ng/Kg	Equivalence ng/Kg	Spike Amount, ng	Labeled Analyte % Recovery
81	1140 D		50.0	0.34141		
77	1130 D		50.0	0.11316	2	87 D
123	5870 D		50.0	0.17598	2	77 D
118	294000 ED		50.0	8.82685	2	75 D
114	12700 D		50.0	0.38029	2	80 D
105	139000 ED		50.0	4.17664	2	86 D
126	287 D		50.0	28.70808	2	87 D
167	13900 D		50.0	0.41735	2	92 D
156	45100 ED		50.0	1.35346	2	75 D
157	10500 D		50.0	0.31623	2	68 D
169	ND		50.0	0.00000	2	57 D
189	1960 D		50.0	0.05882	2	45 D

Total Equivalence

Conc = Concentration

EML = Method Specified Reporting Limit (1668A) EMPC = Estimated Maximum Possible Concentration

A = Reporting Limit based on signal to noise

E = Exceeds calibration range

D = Result obtained from analysis of diluted sample

NA = Not Applicable NC = Not Calculated

ND = Not Detected

Results reported on a dry weight basis and are valid to no more than 3 significant figures.

Equivalence is calculated using WHO factors (2005)

ND = Not Detected

NA = Not Applicable

NC = Not Calculated



Tel: 612-607-1700 Fax: 612- 607-6444

Method 1668 Polychlorobiphenyl Sample Analysis Results

Client - Bowyer Environmental Consulting

Client's Sample ID SPC-CC-40 Lab Sample ID 10153174003 Filename U110411A 06 Injected By **CVS** 11.3 g **Total Amount Extracted**

Matrix Solid % Moisture 5.6 Dilution 10 10.7 g Dry Weight Extracted Collected 10/19/2010

ICAL ID U110312 Received 03/31/2011 10:05 CCal Filename(s) U110411A_01 Extracted 04/07/2011 19:15 Method Blank ID **BLANK-28535** Analyzed 04/11/2011 11:07

PCB Isomer	Native Conc. ng/Kg	EMPC ng/Kg	EML ng/Kg	Equivalence ng/Kg	Spike Amount, ng	Labeled Analyte % Recovery
81 77 123 118 114 105 126 167 156 157 169 189	12000 D 9390 D 67200 ED 1030000 ED 99400 ED 1060000 ED 95100 ED 317000 ED 77300 ED ND 11600 D	2270	50.0 50.0 50.0 50.0 50.0 50.0 50.0 50.0	3.58887 0.93918 2.01643 30.83190 2.98106 31.75044 0.00000 2.85210 9.50439 2.31798 0.00000 0.34857		71 D 49 D 81 I 59 D 61 D 85 D 82 D 74 D 81 D 83 D 65 D
		Total Eq	uivalence	87.1 ng/Kg		

Conc = Concentration

EML = Method Specified Reporting Limit (1668A) EMPC = Estimated Maximum Possible Concentration

E = Exceeds calibration range

I = Interference present

D = Result obtained from analysis of diluted sample

Results reported on a dry weight basis and are valid to no more than 3 significant figures.

Equivalence is calculated using WHO factors (2005)



Method 1668 Polychlorobiphenyl Blank Analysis Results

Lab Sample ID Filename

BLANK-28535 U110410B_09

Injected By

CVS

Total Amount Extracted

CCal Filename(s)

10.9 g U110312 Matrix

Solid

ICAL ID

U110410B_01

Extracted Analyzed 04/07/2011 19:15 04/10/2011 22:22

PCB Isomer	Native Conc. ng/Kg	EMPC ng/Kg	EML ng/Kg	Equivalence ng/Kg	Labeled Analyte % Recovery
81	ND		50.0	0.00000	
77	ND		50.0	0.00000	23
123	ND		50.0	0.00000	29
118	ND		50.0	0.00000	30
114	ND		50.0	0.00000	31
105	ND		50.0	0.00000	37
126	ND		50.0	0.00000	49
167	ND		50.0	0.00000	50
156	ND		50.0	0.00000	51
157	ND		50.0	0.00000	53
169	ND		50.0	0.00000	44
189	ND		50.0	0.00000	38
		Total E	guivalence	0.000 ng/Kg	

Conc = Concentration

EML = Method Specified Reporting Limit (1668A)

EMPC = Estimated Maximum Possible Concentration

ND = Not Detected

NA = Not Applicable

NC = Not Calculated

Results reported on a dry weight basis and are valid to no more than 3 significant figures.

Equivalence is calculated using WHO factors (2005)

Page 13 of 15



Tel: 612-607-1700 Fax: 612-607-6444

Method 1668 Polychlorobiphenyls **Laboratory Control Spike Analysis Results**

Lab Sample ID Filename **Total Amount Extracted** ICAL ID CCal Filename(s)

Method Blank ID

U110410B 04 10.1 g U110312 U110410B 01 BLANK-28535

LCS-28536

Matrix Solid NA Dilution Extracted

04/07/2011 19:15 Analyzed 04/10/2011 19:36

Injected By **CVS**

Native Analytes				Lal	beled Analyt	es
PCB Isomer	Spiked (ng)	Found (ng)	% Recovery	Spiked (ng)	Found (ng)	% Recovery
81	1.0	0.66	66			
77	1.0	0.94	94	2.0	0.33	17 R
123	1.0	0.97	97	2.0	0.48	24 R
118	1.0	1.0	100	2.0	0.50	25 R
114	1.0	1.0	100	2.0	0.52	26 R
105	1.0	0.97	97	2.0	0.66	33 R
126	1.0	0.99	99	2.0	0.95	47
167	1.0	0.97	97	2.0	1.0	50
156	1.0	0.94	94	2.0	1.0	52
157	1.0	0.98	98	2.0	1.1	54
169	1.0	0.97	97	2.0	1.0	52
189	1.0	0.99	99	2.0	0.91	46

R = Recovery outside of method 1668 control limits



Method 1668 Polychlorobiphenyls Laboratory Control Spike Analysis Results

Lab Sample ID Filename

Total Amount Extracted

ICAL ID

CCal Filename(s) Method Blank ID LCSD-28537 U110410B_05

10.1 g U110312

U110410B_01 BLANK-28535 Matrix Dilution Solid NA

Extracted Analyzed NA 04/07/2011 19:15 04/10/2011 20:09

Injected By CVS

	N	lative Analy	tes	Lal	beled Analyt	Analytes		
PCB Isomer	Spiked (ng)	Found (ng)	% Recovery	Spiked (ng)	Found (ng)	% Recovery		
81	1.0	0.61	61					
77	1.0	0.95	95	2.0	0.91	45		
123	1.0	0.99	99	2.0	0.92	46		
118	1.0	1.1	108	2.0	0.95	47		
114	1.0	0.95	95	2.0	1.4	71		
105	1.0	0.98	98	2.0	1.5	73		
126	1.0	0.93	93	2.0	2.3	113		
167	1.0	0.91	91	2.0	2.4	120		
156	1.0	0.96	96	2.0	1.5	75		
157	1.0	0.92	92	2.0	1.7	83		
169	1.0	0.94	94	2.0	1.4	72		
189	1.0	0.96	96	2.0	1.4	69		

R = Recovery outside of method 1668 control limits



Client

Tel: 612-607-1700 Fax: 612- 607-6444

Method 1668 Spike Recovery Relative Percent Difference (RPD) Results

Spike 1 ID	LCS-28536	Spike 2 II		LCSD-28537
Spike 1 Filename	U110410B_04	Spike 2 F		U110410B_05
		Spike 1	Spike	e 2

Bowyer Environmental Consulting

Compound	IUPAC	Spike 1 %REC	Spike 2 %REC	%RPD
3,4,4',5-TeCB	PCB-081	66	61	7.9
3,3',4,4'-TeCB	PCB-077	94	95	1.1
2,3',4,4',5'-PeCB	PCB-123	97	99	2.0
2,3',4,4',5-PeCB	PCB-118	100	108	7.7
2,3,4,4',5-PeCB	PCB-114	100	95	5.1
2,3,3',4,4'-PeCB	PCB-105	97	98	1.0
3,3',4,4',5-PeCB	PCB-126	99	93	6.3
2,3',4,4',5,5'-HxCB	PCB-167	97	91	6.4
2,3,3',4,4',5-HxCB	PCB-156	94	96	2.1
2,3,3',4,4',5'-HxCB	PCB-157	98	92	6.3
3,3',4,4',5,5'-HxCB	PCB-169	97	94	3.1
2,3,3',4,4',5,5'-HpCB	PCB-189	99	96	3.1

%REC = Percent Recovered

RPD = The difference between the two values divided by the mean value



Pace Analytical Services, Inc.

1700 Elm Street Minneapolis, MN 55414 Phone: 612.607.1700

none: 612.607.1700 Fax: 612.607.6444

Report Prepared for:

Brett Bowyer Bowyer Environmental Consulting 17011 Beach Blvd Huntington Beach CA 92647

> REPORT OF LABORATORY ANALYSIS FOR PCBs

Report Information:

Pace Project #: 10153189

Sample Receipt Date: 03/31/2011

Client Project #: 08010007

Client Sub PO #: N/A State Cert #: 01155CA

Invoicing & Reporting Options:

The report provided has been invoiced as a Level 2 PCB Report. If an upgrade of this report package is requested, an additional charge may be applied.

Please review the attached invoice for accuracy and forward any questions to Scott Unze, your Pace Project Manager.

This report has been reviewed by:

July 21, 2011

Scott Unze, Project Manager

(612) 607-6383

(612) 607-6444 (fax)

scott.unze@pacelabs.com



This report should not be reproduced, except in full, without the written consent of Pace Analytical Services, Inc.

The results relate only to the samples included in this report.

Report Prepared Date:

July 14, 2011



Pace Analytical Services, Inc.

1700 Elm Street Minneapolis, MN 55414

Phone: 612.607.1700 Fax: 612.607.6444

DISCUSSION

This report was revised after evaluation of the results as compared to the Method 1668C criteria. The analytical approach used for Method 1668A does not change upon migration to 1668C, only the acceptance criteria are different. These results were re-processed using the 1668C criteria and only minimal changes occurred. Those changes were the addition of one "R" flag each to LCS-28552 and LCSD-28553.

This report presents the results from the analyses performed on two samples submitted by a representative of Bowyer Environmental Consulting. The samples were analyzed for the presence or absence of selected polychlorobiphenyls (PCBs) using a modified version of USEPA Method 1668. Reporting limits were set to 50 ng/Kg.

The recoveries of the isotopically-labeled PCB internal standards in the sample extracts ranged from 29-92%. All of the labeled standard recoveries obtained for this project were within the target ranges specified in Method 1668. Also, since the quantification of the native congeners was based on isotope dilution, the data were automatically corrected for variation in recovery and accurate values were obtained.

A laboratory method blank was prepared and analyzed with each sample batch as part of our routine quality control procedures. The results show the blanks to be free of the target PCB congeners at the reporting limits. These results indicate that the sample processing steps did not contribute significantly to the levels reported for the field samples.

Laboratory spike samples were also prepared with the sample batches using clean sand that had been fortified with native standard materials. The results show that the spiked native compounds were recovered at 73-119%, with relative percent differences of 0.0-10.4%. These results indicate high degrees of accuracy and precision for these determinations. Matrix spikes were not prepared with the sample batches.

REPORT OF LABORATORY ANALYSIS

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Minnesota Laboratory Certifications

Authority	Certificate #	Authority	Certificate #
Alabama	40770	Montana	92
Alaska	MN00064	Nebraska	
Arizona	AZ0014	Nevada	MN000642010A
Arkansas	88-0680	New Jersey (NE	MN002
California	01155CA	New Mexico	MN00064
Colorado	MN00064	New York (NEL	11647
Connecticut	PH-0256	North Carolina	27700
EPA Region 5	WD-15J	North Dakota	R-036
EPA Region 8	8TMS-Q	Ohio	4150
Florida (NELAP	E87605	Ohio VAP	CL101
Georgia (DNR)	959	Oklahoma	D9922
Guam	959	Oregon (ELAP)	MN200001-005
Hawaii	SLD	Oregon (OREL	MN200001-005
Idaho	MN00064	Pennsylvania	68-00563
Illinois	200012	Saipan	MP0003
Indiana	C-MN-01	South Carolina	74003001
Indiana	C-MN-01	Tennesee	2818
lowa	368	Tennessee	02818
Kansas	E-10167	Texas	T104704192-08
Kentucky	90062	Utah (NELAP)	PAM
Louisiana	LA0900016	Virginia	00251
Maine	2007029	Washington	C755
Maryland	322	West Virginia	9952C
Michigan	9909	Wisconsin	999407970
Minnesota	027-053-137	Wyoming	8TMS-Q
Mississippi	MN00064		

REPORT OF LABORATORY ANALYSIS

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Appendix A

Sample Management

Report No.....10153189_1668

Pace Analytical www.pacelabs.com

1150

CHAIN-OF-CUSTODY / Analytical Request Document The Chain-of-Custody is a LEGAL DOCUMENT. All relevant fields must be completed accurately.

10153189

Section A Sequired Client Information:	Section B			Section	C																				Page: /	of of	
equired Client Information:	Required Project Information:				formation	1:								_	_	_							_				
Company: Bowyer Environmental Consul	Report To: Bowyer Environ Copy To: Bowyer Environ	MCRI	ب	Attention		ine	Bony	er							_										GENCY		
- /7	F. SEFE COM	145		Compan	y Name:	Bowy	er E	Povira	1 men	10	_C	n S	177	, 4	1	1	ŗ	NPD	ÆS	厂	GRC	DUND	WATI		- DRINKI		- 1
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mail To: brett bouyer Chouyer environment	Purchase Order No.:		1	Pace Qu	ote Refer	ence:	HUAT	ing Ton	Bee	رک	C	A	4 Z	54	7			SIT	Έ		3	ΓG/	A F	IL T	IN T	'vii [1C
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O)	Project Number: 0801000	7		Pace Pro	ofile#:											_ [Filte	red (Y/N)		7	77	7	77	77	17	
Section D Required Client Information	Vend Metro Codes		٩		COLL	CTED		<u> </u>	g		F	rese	rvativ	es			Requ			7	7	//	77	77	777	7	
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Pace Analytical Client Name	:/	Bot	NYE	'K	Project #_	10153189
Courier: Fed Ex JPS USPS Clied Tracking #: 1945 747 700 Clied Tracking #: 1945 Yes	_/	Comi		Pace Other	□ no	ai f Bar (6) li k Rhur)
	_					Yes No
Packing Material: Bubble Wrap Bubble Thermometer Used 80344042 or 179425	_	_	None: (Wel		Temp Blank:	cooling process has begun
				is Frozen: Yes No	Date and in	tigle of person examining
Temp should be above freezing to 6°C	BIOIC	givai	I IDDU	Comments:	contents:	3/31/1186
Chain of Custody Present:	ZYee	□No	□N⁄A	Ī ₁ .		
Chain of Custody Filled Out:	☑ Yes	□No	□N⁄A	2.		
Chain of Custody Relinquished:	ZYes	□No	□N/A	3.		
Sampler Name & Signature on COC:	□Yes	[Z]No	□N⁄A	4.		
Samples Arrived within Hold Time:	Yes		DNA	5.		
Short Hold Time Analysis (<72hr):	□Yes	12/1/0	ÐN/A	6.		
Rush Turn Around Time Requested:	□Yes	[]No	□N⁄A	7.		
Sufficient Volume:	2Yes	□No	□N⁄A	8.		
Correct Containers Used:	DY es	□No	DNA	9.		
-Pace Containers Used:	□Yee	131%	□N⁄A			
Containers intact:	Z Yes	□No	□N⁄A	10.		
Filtered volume received for Dissolved tests	□Yes	□No	TZINIA	11.		
Sample Labels match COC:	-ETYes	□No	□N⁄A	12.		
-includes date/time/ID/Analysis Matrix:	51					
All containers needing acid/base preservation have been checked. Noncompliance are noted in 13.	□Yes	□No	DANA	13. 🗆 [†]	H2804	□ NaOH □ HCI
All containers needing preservation are found to be in compliance with EPA recommendation.	□Yes	□No	EINA	Samp #		
Exceptions: VOA,Cofform, TOC, Oil and Grease, Wi-DRO (wate	, □Yes	Z No	_	Initial when completed	Lot # of added preservative	
Samples checked for dechlorination:	□Yes		TINA		Maria de la companya	
Headspace in VOA Vials (>6mm):	□Yes		ENA		·	
Trip Blank Present:	□Yee		□N⁄A		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	
Trip Blank Custody Seals Present	□Yes	□No	□N/g/	/		
Pace Trip Blank Lot # (if purchased):						
Client Notification/ Resolution:				·	Field Data Requi	red? Y / N
Person Contacted:			Date/	Γime:		
Comments/ Resolution:			_			
Project Manager Review:			(I)		Date:	03/31/11

Sample Condition Upon Receipt

Note: Whenever there is a discrepancy affecting North Carolina compliance samples, a copy of this form will be sent to the **Result Adaptical State**, inc. F-L213Rev.00, 05Aug2009

1700 Elm Street SE, Suite 200, Minneapolis, MN 55414



Reporting Flags

- A = Reporting Limit based on signal to noise
- B = Less than 10x higher than method blank level
- C = Result obtained from confirmation analysis
- D = Result obtained from analysis of diluted sample
- E = Exceeds calibration range
- Interference present
- J = Estimated value
- Nn = Value obtained from additional analysis
- P = PCDE Interference
- R = Recovery outside target range
- S = Peak saturated
- U = Analyte not detected
- V = Result verified by confirmation analysis
- X = %D Exceeds limits
- Y = Calculated using average of daily RFs
- See Discussion

Appendix B

Sample Analysis Summary



Method 1668 Polychlorobiphenyl Sample Analysis Results

Client - Bowyer Environmental Consulting

Client's Sample ID

Lab Sample İD Filename L-13-3 10153189001-2R F110511A_04

Injected By

SMT

Total Amount Extracted % Moisture

2.00 g 8.8 1.82 g Matrix Solid Dilution 10

))

Dry Weight Extracted ICAL ID

1.82 g F110510

Collected Received Extracted 07/26/2010 12:00 03/31/2011 10:05 05/06/2011 18:45

CCal Filename(s)
Method Blank ID

F110511A_01 BLANK-28852

Extracted Analyzed

05/11/2011 08:50

ND = Not Detected

NA = Not Applicable NC = Not Calculated

PCB Isomer	Native Conc. ng/Kg	EMPC ng/Kg	EML ng/Kg	Equivalence ng/Kg	Spike Amount, ng	Labeled Analyte % Recovery
81	ND		50.0	0.00000		
77	206 JD		50.0	0.02060	2	92 D
123	267 JD		50.0	0.00802	2	90 D
118	15100 D		50.0	0.45391	2	87 D
114	487 JD		50.0	0.01461	2	87 D
105	6270 D		50.0	0.18806	2	87 D
126	ND		50.0	0.00000	2	55 D
167	632 JD		50.0	0.01896	2	47 D
156	1550 D		50.0	0.04640	2	43 D
157	372 JD		50.0	0.01117	2	39 D
169	ND		50.0	0.00000	2	36 D
189	106 JD		50.0	0.00318	2	29 D

Total Equivalence

0.765 ng/Kg

Conc = Concentration

EML = Method Specified Reporting Limit (1668A)

EMPC = Estimated Maximum Possible Concentration

J = Estimated value

A = Reporting Limit based on signal to noise

R = Recovery outside target range

D = Result obtained from analysis of diluted sample

Results reported on a dry weight basis and are valid to no more than 3 significant figures.

Equivalence is calculated using WHO factors (2005)

Solid

07/26/2010 12:33

03/31/2011 10:05

04/07/2011 18:20

04/19/2011 04:07

10

Analyzed

0.0583 ng/Kg



Tel: 612-607-1700 Fax: 612- 607-6444

Method 1668 Polychlorobiphenyl Sample Analysis Results

Client - Bowyer Environmental Consulting

Client's Sample ID A-4-1 Lab Sample ID 10153189002 Filename F110418B 09 SMT Injected By **Total Amount Extracted** 26.0 g Matrix % Moisture 61.5 Dilution Dry Weight Extracted 10.0 g Collected ICAL ID F101226 Received CCal Filename(s) F110418B 01 Extracted Method Blank ID BLANK-28551

PCB Isomer	Native Conc. ng/Kg	EMPC ng/Kg	EML ng/Kg	Equivalence ng/Kg	Spike Amount, ng	Labeled Analyte % Recovery
81	ND		50.0	0.00000		
77	ND		50.0	0.00000	2	63 D
123	ND		50.0	0.00000	2	82 D
118	1290 D		50.0	0.03862	2	81 D
114	ND		50.0	0.00000	2	82 D
105	430 D		50.0	0.01289	2	85 D
126	ND		50.0	0.00000	2	87 D
167	82.2 JD		50.0	0.00247	2	84 D
156	144 JD		50.0	0.00433	2	83 D
157	ND		50.0	0.00000	2	80 D
169	ND		50.0	0.00000	2	89 D
189	ND		50.0	0.00000	2	70 D

Total Equivalence

Conc = Concentration

EML = Method Specified Reporting Limit (1668A) EMPC = Estimated Maximum Possible Concentration

J = Estimated value

D = Result obtained from analysis of diluted sample

ND = Not Detected NA = Not Applicable NC = Not Calculated

Results reported on a dry weight basis and are valid to no more than 3 significant figures.

Equivalence is calculated using WHO factors (2005)



Method 1668 Polychlorobiphenyl Blank Analysis Results

Lab Sample ID Filename

CCal Filename(s)

BLANK-28551 U110410B 08

Injected By

CVS

Total Amount Extracted

10.1 g

Matrix

Solid

ICAL ID

U110312 U110410B 01

Extracted Analyzed 04/07/2011 18:20 04/10/2011 21:49

PCB Isomer	Native Conc. ng/Kg	EMPC ng/Kg	EML ng/Kg	Equivalenc ng/Kg	e Labeled Analyte % Recovery
81	ND		50.0	0.00000	
77	ND		50.0	0.00000	34
123	ND		50.0	0.00000	39
118	ND		50.0	0.00000	42
114	ND		50.0	0.00000	43
105	ND		50.0	0.00000	48
126	ND		50.0	0.00000	58
167	ND		50.0	0.00000	57
156	ND		50.0	0.00000	51
157	ND		50.0	0.00000	57
169	ND		50.0	0.00000	42
189	ND		50.0	0.00000	39
		Total Ed	quivalence	0.000 ng/Kg	

Conc = Concentration

EML = Method Specified Reporting Limit (1668A)

EMPC = Estimated Maximum Possible Concentration

ND = Not Detected

NA = Not Applicable

NC = Not Calculated

Results reported on a dry weight basis and are valid to no more than 3 significant figures.

Equivalence is calculated using WHO factors (2005)



Method 1668 Polychlorobiphenyl Blank Analysis Results

Lab Sample ID

BLANK-28852

Filename

F110510A 12

Injected By

Total Amount Extracted

10.1 g

Matrix

ICAL ID

F110510

Extracted

Solid 05/06/2011 18:45

CCal Filename(s)

F110510A 06

Analyzed

05/10/2011 15:12

PCB Isomer	Native Conc. ng/Kg	EMPC ng/Kg	EML ng/Kg	Equivalence ng/Kg	Labeled Analyte % Recovery
81	ND		50.0	0.00000	
77	ND		50.0	0.00000	66
123	ND		50.0	0.00000	65
118	ND		50.0	0.00000	65
114	ND		50.0	0.00000	65
105	ND		50.0	0.00000	70
126	ND		50.0	0.00000	67
167	ND		50.0	0.00000	71
156	ND		50.0	0.00000	75
157	ND		50.0	0.00000	64
169	ND		50.0	0.00000	77
189	ND		50.0	0.00000	74
		T () F		0.000 #/	

Total Equivalence

0.000 ng/Kg

Conc = Concentration EML = Method Specified Reporting Limit (1668A)

EMPC = Estimated Maximum Possible Concentration

ND = Not Detected NA = Not Applicable

NC = Not Calculated

Results reported on a dry weight basis and are valid to no more than 3 significant figures.

Equivalence is calculated using WHO factors (2005)



Method 1668 Polychlorobiphenyls **Laboratory Control Spike Analysis Results**

Lab Sample ID

Filename

Total Amount Extracted

ICAL ID

CCal Filename(s) Method Blank ID

LCS-28552 U110410B_02

10.3 g

U110312 U110410B 01

BLANK-28551

Matrix Dilution

Extracted Analyzed Solid NA

04/07/2011 18:20 04/10/2011 18:30

Injected By **CVS**

PCB Isomer	Native Analytes			Labeled Analytes			
	Spiked (ng)	Found (ng)	% Recovery	Spiked (ng)	Found (ng)	% Recover	
81	1.0	0.81	81				
77	1.0	0.97	97	2.0	0.79	39 F	
123	1.0	0.99	99	2.0	0.95	47	
118	1.0	1.1	113	2.0	0.98	49	
114	1.0	0.98	98	2.0	1.0	52	
105	1.0	1.0	100	2.0	1.1	57	
126	1.0	0.98	98	2.0	1.3	64	
167	1.0	0.95	95	2.0	1.3	63	
156	1.0	1.0	102	2.0	1.1	54	
157	1.0	0.92	92	2.0	1.3	66	
169	1.0	0.88	88	2.0	1.1	57	
189	1.0	0.96	96	2.0	1.5	76	

R = Recovery outside of method 1668 control limits

Page 14 of 18



Tel: 612-607-1700 Fax: 612- 607-6444

Method 1668 Polychlorobiphenyls **Laboratory Control Spike Analysis Results**

Lab Sample ID Filename **Total Amount Extracted**

ICAL ID CCal Filename(s) Method Blank ID

LCS-28853 F110510A 09

10.1 g F110510 F110510A 06 **BLANK-28852** Matrix Dilution

Extracted Analyzed Solid NA

05/06/2011 18:45 05/10/2011 13:45

Injected By **SMT**

	N	Native Analytes			Labeled Analytes		
PCB Isomer	Spiked (ng)	Found (ng)	% Recovery	Spiked (ng)	Found (ng)	% Recovery	
81	1.0	1.00	100				
77	1.0	1.1	106	2.0	1.4	70	
123	1.0	1.0	103	2.0	1.3	67	
118	1.0	1.2	119	2.0	1.3	64	
114	1.0	1.0	103	2.0	1.3	66	
105	1.0	1.1	110	2.0	1.4	72	
126	1.0	1.1	107	2.0	1.2	58	
167	1.0	1.0	104	2.0	1.2	61	
156	1.0	1.0	104	2.0	1.5	76	
157	1.0	0.95	95	2.0	1.0	52	
169	1.0	1.1	107	2.0	1.3	67	
189	1.0	1.1	106	2.0	1.4	71	

R = Recovery outside of method 1668 control limits

Page 15 of 18



Tel: 612-607-1700 Fax: 612- 607-6444

Method 1668 Polychlorobiphenyls Laboratory Control Spike Analysis Results

Lab Sample ID Filename

Total Amount Extracted

ICAL ID

CCal Filename(s) Method Blank ID

LCSD-28553 U110410B_03

10.1 g U110312

U110410B 01 BLANK-28551 Matrix Dilution

Solid NA

Extracted Analyzed

04/07/2011 18:20 04/10/2011 19:02

Injected By **CVS**

Native Analytes

Labeled Analytes

	Native Allalytes			Labeleu Allalytes			
PCB Isomer	Spiked (ng)	Found (ng)	% Recovery	Spiked (ng)	Found (ng)	% Recovery	
81	1.0	0.73	73				
77	1.0	0.95	95	2.0	0.78	39 R	
123	1.0	0.98	98	2.0	0.93	46	
118	1.0	1.1	112	2.0	0.90	45	
114	1.0	0.97	97	2.0	1.0	51	
105	1.0	1.0	102	2.0	1.0	52	
126	1.0	1.00	100	2.0	1.2	60	
167	1.0	0.95	95	2.0	1.2	59	
156	1.0	1.0	100	2.0	1.0	52	
157	1.0	0.95	95	2.0	1.2	60	
169	1.0	0.95	95	2.0	0.98	49	
189	1.0	0.95	95	2.0	1.0	52	

R = Recovery outside of method 1668 control limits



Tel: 612-607-1700 Fax: 612- 607-6444

Method 1668 Polychlorobiphenyls **Laboratory Control Spike Analysis Results**

Lab Sample ID Filename

Total Amount Extracted ICAL ID

CCal Filename(s) Method Blank ID

LCSD-28854

F110510A_10 10.7 g

F110510 F110510A_06 **BLANK-28852** Matrix Dilution Solid NA

Extracted Analyzed 05/06/2011 18:45 05/10/2011 14:13

%

Injected By

SMT

	Native Analytes			Labeled Analytes		
PCB	Spiked	Found	%	Spiked	Found	
Isomer	(ng)	(ng)	Recovery	(ng)	(ng)	Re

Isomer	(ng)	(ng)	Recovery	(ng)	(ng)	Recovery
81	1.0	0.97	97			
77	1.0	1.0	102	2.0	1.5	76
123	1.0	1.0	101	2.0	1.4	72
118	1.0	1.2	117	2.0	1.3	65
114	1.0	1.00	100	2.0	1.4	69
105	1.0	1.1	106	2.0	1.6	79
126	1.0	0.99	99	2.0	1.3	66
167	1.0	1.00	100	2.0	1.2	62
156	1.0	0.99	99	2.0	1.6	80
157	1.0	0.90	90	2.0	1.1	54
169	1.0	1.0	101	2.0	1.6	78
189	1.0	0.98	98	2.0	1.4	70

R = Recovery outside of method 1668 control limits



Tel: 612-607-1700 Fax: 612- 607-6444

Method 1668 Spike Recovery Relative Percent Difference (RPD) Results

Client

Bowyer Environmental Consulting

Spike 1 ID Spike 1 Filename LCS-28552 U110410B_02 Spike 2 ID Spike 2 Filename LCSD-28553 U110410B_03

Compound	IUPAC	Spike 1 %REC	Spike 2 %REC	%RPD	
3,4,4',5-TeCB	PCB-081	81	73	10.4	
3,3',4,4'-TeCB	PCB-077	97	95	2.1	
2,3',4,4',5'-PeCB	PCB-123	99	98	1.0	
2,3',4,4',5-PeCB	PCB-118	113	112	0.9	
2,3,4,4',5-PeCB	PCB-114	98	97	1.0	
2,3,3',4,4'-PeCB	PCB-105	100	102	2.0	
3,3',4,4',5-PeCB	PCB-126	98	100	2.0	
2,3',4,4',5,5'-HxCB	PCB-167	95	95	0.0	
2,3,3',4,4',5-HxCB	PCB-156	102	100	2.0	
2,3,3',4,4',5'-HxCB	PCB-157	92	95	3.2	
3,3',4,4',5,5'-HxCB	PCB-169	88	95	7.7	
2,3,3',4,4',5,5'-HpCB	PCB-189	96	95	1.0	

%REC = Percent Recovered

RPD = The difference between the two values divided by the mean value



Tel: 612-607-1700 Fax: 612- 607-6444

Method 1668 Spike Recovery Relative Percent Difference (RPD) Results

Client Bowyer Environmental Consulting

Spike 1 ID	LCS-28853	Spike 2 ID	LCSD-28854
Spike 1 Filename	F110510A_09	Spike 2 Filename	F110510A_10

Compound	IUPAC	Spike 1 %REC	Spike 2 %REC	%RPD	
3,4,4',5-TeCB	PCB-081	100	97	3.0	
3,3',4,4'-TeCB	PCB-077	106	102	3.8	
2,3',4,4',5'-PeCB	PCB-123	103	101	2.0	
2,3',4,4',5-PeCB	PCB-118	119	117	1.7	
2,3,4,4',5-PeCB	PCB-114	103	100	3.0	
2,3,3',4,4'-PeCB	PCB-105	110	106	3.7	
3,3',4,4',5-PeCB	PCB-126	107	99	7.8	
2,3',4,4',5,5'-HxCB	PCB-167	104	100	3.9	
2,3,3',4,4',5-HxCB	PCB-156	104	99	4.9	
2,3,3',4,4',5'-HxCB	PCB-157	95	90	5.4	
3,3',4,4',5,5'-HxCB	PCB-169	107	101	5.8	
2,3,3',4,4',5,5'-HpCB	PCB-189	106	98	7.8	

%REC = Percent Recovered

RPD = The difference between the two values divided by the mean value

Attachment C

EPA Approval of Congener Analysis

Brett Bowyer

From:

Santos.Carmen@epamail.epa.gov

Sent:

Thursday, March 24, 2011 11:12 AM Brett Bowyer

Cc:

Wilson.Patrick@epamail.epa.gov

Subject:

PCBs: Former Sunkist Citrus Processing Plant - Congener Analysis

Hello Brett:

Thank you for your patience and please accept my apologies for not responding sooner to your proposal (attached below) for sampling and analysis of dioxin-like PCB congeners. Please go ahead with the congener sampling and analysis that you proposed on February 24, 2011.

Thank you for your courtesies and patience.

Sincerely, Carmen

Carmen D. Santos PCB Coordinator RCRA Corrective Action Office (WST-5) Waste Management Division USEPA Region 9 voice: 415.972.3360

e-mail: santos.carmen@epa.gov

"Earth laughs in flowers." R. W. Emerson

From:

"Brett Bowyer" < brettbowyer@bowyerenvironmental.com>

To: Co: Carmen Santos/R9/USEPA/US@EPA
"'Rudd, Keith'" < krudd@Sunkistgrowers.com>

Date:

02/21/2011 06:13 PM

Subject:

Congener Analysis

Hello Carmen,

Following our discussions last Wednesday, I checked my records and believe that I never sent you the official request to move forward with the congener analysis. My apologize on this, I thought that I had already made the request.

In any event, as we discussed during our conference call, you will approve the analysis of 5% of the total samples tested. During the demolition process, a total of 45 AOC soil samples and 51 crushed concrete sampled (96 total samples). As such, we have selected the two highest soil and three highest concrete samples for PCB congener analysis. These samples are:

A-4-1 (soil): 2.02 mg/kg;

L-13-3 (soil): 2.37 mg/kg;

- SPC-CC-16: 27.2 mg/kg;
- SPC-CC-39: 9.28; and
- SPC-CC-40: 14.0 mg/kg.

Please confirm that the analyses of these samples is as per our discussions and we will get these started right away.

Thanks.

Brett Bowyer, P.G. Bowyer Environmental Consulting, Inc. 17011 Beach Boulevard, Suite 900 Huntington Beach, CA 92647 Office: (877) BEC-INC-0

(877) 232-4620 Cell: (714) 878-7191 FAX: (714) 840-4963

brettbowyer@bowyerenvironmental.com

www.bowyerenvironmental.com

This message contains information that may be confidential, proprietary, privileged, or otherwise protected by law from disclosure or use by a third party. If you have received this message in error, please contact us immediately and take the steps necessary to delete this message completely from your computer system. Thank you.

Attachment D

Risk Assessment/RAP Approval by San Bernardino County

SAN BERNARDINO COUNTY FIRE DEPARTMENT

OFFICE OF THE FIRE MARSHAL HAZARDOUS MATERIALS DIVISION 620 South "E" Street • San Bernardino, CA 92415-0153 (909) 386-8401 • Fax (909) 386-8460



COUNTY OF SAN BERNARDINO

MARK A. HARTWIG Fire Chief

RECEIVED

JUL 08 2011

July 7, 2011

SUNKIST GROWERS INC. 14130 RIVERSIDE DRIVE SHERMAN OAKS, CA 94123 P.O. BOX 7888 VAN NUYS, CA 91409-7888 SITE # 2009004

APN 1049-221-01

ATTENTION: KEITH RUDD

SUBJECT: EVALUATION OF REMEDIAL ACTION PLAN FOR THE FORMER SUNKIST CITRUS PROCESSING PLANT, 616 E. SUNKIST AVENUE, ONTARIO, CA 91761

The Department has reviewed the above referenced document submitted by LOR Geotechnical Group Inc. dated June 27, 2011. We concur with the conclusions and recommendations in the evaluation that states "it appears that adequate assessment and characterization of potential COC at the site has been conducted. The assumptions and scientific application presented in the HHRA are reasonable and based on sound risk assessment practice."

You are approved to proceed with the field work necessary to implement the Remedial Action Plan.

If you have any questions, please contact me at (909) 386-8419.

JACKSON CRUTSINGER, R.E.H.S., R.H.S.P.

HAZARDOUS MATERIALS DIVISION

HAZARDOUS MATERIALS SPECIALIST III

SITE REMEDIATION/LOCAL OVERSIGHT PROGRAM

cc: Brett Bowyer P.G., BEC

Sharon Boltinghouse P.G., Riverside County LOP

Richard Orr P.G., Leighton and Associates

June 27, 2011

County of San Bernardino Fire Department Hazardous Materials Division 620 South 'E' Street San Bernardino, California 92415 Project No. 61658S.22

Attention:

Mr. Jackson Crutsinger, REHS, RHSP, Hazardous Materials Specialist III

Subject:

Evaluation of Remedial Action Plan for the Former Sunkist Citrus

Processing Plant, 616 East Sunkist Street, Ontario, California

Reference:

Bowyer Environmental Consulting, Inc., 2011, Remedial Action Plan,

Former Sunkist Citrus Processing Plant, 616 East Sunkist Street, Ontario,

California, BEC Project No.: 08010007, Dated May 22, 2011

We have reviewed the Remedial Action Plan (RAP) by Bowyer Environmental Consulting, Inc. (BEC), provided by the County of San Bernardino Fire Department, Hazardous Materials Division (CSBFD-HMD), for the above subject site. This review was conducted to evaluate the RAP with respect to the Human Health Risk Assessment (HHRA) for soil contamination that will be left in place at the site, following the planned remedial activities.

The RAP includes background documentation of site activities and previous site assessment and remediation activities at the subject site. Below is a summary of this documented information.

Site Background

The subject site was developed as a citrus by-products plant in 1926 by the Ontario Citrus Exchange (a predecessor to Sunkist). As of early 2010, the site consisted of 23 buildings, a waste water treatment plant, a dryers area, a waste/heat area, a wet peel area, and a fenced-in Southern California Edison transformer.

Sunkist terminated citrus processing, for the most part, in 2008. The wastewater treatment plant continues to operate to accommodate the ongoing bulk storage operation that Partners Alliance operates north of the Sunkist site. Partners Alliance

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is in the process of rerouting wastewater to the City of Ontario's sewer system and will no longer need to utilize the wastewater treatment system.

The City of Ontario (City) is in the process of acquiring the subject site in association with a new commercial and/or industrial development. Proposed future development plans involve the development of a new multi-tenant industrial park.

Previous Site Assessment

Leighton and Associates (Leighton) prepared Phase I Environmental Site Assessment (ESA) and Limited Phase II ESA reports in September and October, 2008, respectively. As a follow up to the Limited Phase II ESA, BEC conducted the following: a Work Plan for Recommended Environmental Activities (March, 2009), Work Plan for UST Removal (July, 2009), Interim Report - Soil Removal and Confirmation Sampling (July, 2009), Additional Investigation - Pre-Demolition Site Characterization (September, 2009), UST Removal Report - Soil Removal and Confirmation Sampling (January, 2010), and Removal Action Work Plan (June, 2010). The Leighton Limited Phase II ESA and BEC Additional Investigation - Pre-Demolition Site Characterization resulted in the drilling and sampling of 101 soil borings.

Selected soil samples collected from these soil borings were analyzed for the following: California Assessment Manual (CAM) metals, hexavalent chromium, total petroleum hydrocarbons as gasoline, total petroleum hydrocarbons as diesel (TPH-D), total petroleum hydrocarbons as oil, polynuclear aromatic hydrocarbons (PAHs), semi-volatile organic compounds, polychlorinated biphenyls (PCBs), organochlorine pesticides (OCPs), and volatile organic compounds (VOCs). In addition, 32 shallow (5-foot) and 14 deeper (15-foot) soil vapor points were installed and sampled for VOCs during these investigations.

Removal/Demolition Activities

Based on these investigations, two areas (designated Area 11C and Area 20 in the reports) were found to contain PCBs in excess of California Human Health Screening Levels (CHHSLs) for commercial/industrial property use. One additional area (Area 24C) was found to contain debris with soluble lead in excess of the California hazardous waste criteria, soluble threshold limit concentration.

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As summarized in BEC's Interim Report - Soil Removal and Confirmation Sampling Report, initial soil removal activity was implemented to address these areas. However, due to the presence of existing structures, further excavations and soil removal activities in two areas (11C and 24C) were deferred until the overlying structures had been removed.

Demolition activities began at the Site in late 2009. These activities have included the demolition of all building and structures. Prior to demolition, asbestos and lead abatement activities were implemented. These abatement activities were conducted per the requirements of the South Coast Air Quality Management District. In addition, environmental monitoring activities have been conducted per the CSBFD-HMD approved Removal Action Work Plan. The environmental monitoring consisted of visual, olfactory, and field screening with flame-ionization and photo-ionization devices during the demolition of surface and subsurface site features. Areas that exhibited any of the criteria were designated areas of concern (AOC) and sampled. Twenty-six AOC were identified during the demolition activities, and soil samples were obtained for analysis. Soil samples were also collected from beneath eight hydraulic lifts.

In September of 2010, soil with PCBs above the CHHSLs was removed from below a former hydraulic lift located in the basement of building 64, one of the AOC. The soil removal was conducted to facilitate the placement of crushed concrete generated during demolition activities as a basement backfill material. Approximately 25 cubic yards (yd³) of soil was removed from below the former hydraulic lift, and stockpiled on-site. Crushed concrete was used as backfill material for the basements of former buildings 11, 21, and 64.

Crushing of previously stockpiled, concrete, asphalt, brick, and other materials generated during the demolition process (processed material) commenced in September, 2010. Upon initiation of the crushing operations, twenty-three samples of the processed material and one sample of the initially crushed material (placed in the basements of buildings 11, 21, and 64) were collected. Each of these twenty-four samples were analyzed for PCBs and TPH, as these compounds were the most frequently observed in subsurface soil samples collected at the AOC and lifts. Additionally, four samples of the processed material and one sample of the initially crushed material were also analyzed for VOCs, PAHs, OCPs, and CAM metals. Results of these analyses did not detect the presence of VOCs or OCPs. In addition, relatively

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low levels of metals, PAHs, and TPH were observed. However, PCBs, above screening levels, were observed in several samples of the processed material, and the material initially crushed was used as backfill for the basements in building 11, 21, and 64.

Based on the results and the space constraints at the site, crushed material was placed within the existing basement structures. A sample was obtained for PCB analysis in approximately every 640 yd³ of the crushed material. The results ranged from non-detect to 27.2 milligrams per kilogram (mg/kg) of PCBs.

Additional PCB Sampling Activities

Additional PCB sampling activities were coordinated with the United States Environmental Protection Agency, Region IX (EPA) and CSBFD-HMD. During October of 2010, 76 samples of porous material were taken from previously demolished and existing buildings, and were analyzed for PCBs. On December 30, 2010, samples of uncrushed stockpile material from buildings 12 and 15 were sampled and analyzed for PCBs. On February 27, 2011, 36 porous material samples of the basement concrete floor of building 12 were sampled and analyzed for PCBs. On February, 2011, 10 soil samples of the soil beneath the concrete floor of building 12 were obtained and analyzed for PCBs. The results indicated the material being crushed and used as backfill does not contain significant concentrations of PCBs, so as to pose a risk to human health or the environment.

Human Health Risk Assessment

The HHRA (April, 2011), conducted by BEC, evaluated the potential risk to on- and off-site receptors from soil, soil gas, and the crushed concrete present at the site. The potential receptors were indoor worker, outdoor non-intrusive worker, construction worker, and off-site residential. The compounds of concern (COC) evaluated in the HHRA were PCBs (primarily Aroclor 1254) in the crushed material, TPH-D, and PAHs above background levels. The impacted soil, soil gas, and crushed material were evaluated separately in the HHRA, in accordance with EPA and California Office of Environmental Health Hazard Assessment (OEHHA) guidance.

The results of the HHRA indicated that the PCBs above 6.4 mg/kg, the PAHs above ambient background levels for the area, and the TPH-D present at the site could cause a potentially unacceptable health risk to future on-site workers and off-site residents.

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Proposed Remedial Action

To eliminate the potentially unacceptable health risk to on-site workers and off-site residents, the following remedial action was proposed:

- Remove the crushed material (concrete) from the basement of building 21 and the stockpiles W-N, D, 10,16, and 17/18. The removal of these materials will produce a 95 percent upper confidence level that the remaining crushed material will have concentrations of PCBs less than the HHRA acceptable risk level at 6.4 mg/kg.
- Remove the elevated levels of TPH-D located at the AOC identified as B-5-1, D-1-1, and former lift L-13. The removal of the TPH-D impacted soil from these areas will result in the total concentration of TPH-D below HHRA site specific goals.
- Removal of the one area (AOC D-5-1) of PAHs above the Southern California ambient background level, which is also the area with the highest TPH-D concentration.

In addition to the above remedial actions, BEC will also provide environmental monitoring during the demolition to evaluate and identify any new AOC; provide oversight for concrete removal in compliance with the Federal Toxic Substances Control Act (TSCA); provide oversight of the removal of soil containing TPH-D and PAHs in excess of HHRA requirements; and provide oversight of the removal of soil with lead above regulatory limits. The results of the above work will be documented in a post-remedial action report for the site.

Conclusions and Recommendations

Based on the information reviewed, it appears that adequate assessment and characterization of potential COC at the site has been conducted. The assumptions and scientific application presented in the HHRA are reasonable and based on sound risk assessment practice. The multiple layers of conservative assumptions in the HHRA compensate for unavoidable uncertainties, and most likely overestimate the risk presented.

We concur with the planned removal of the "hot spots" present at the site, which include the crushed concrete from the basement of building 21 and the stockpiles W-N, D, 10,16, and 17/18, the elevated levels of TPH-D located at the AOC identified as B-5-1, D-1-1, and former lift L-13, the area of PAHs at AOC D-5-1, and lead containing soil above current CHHSLs at area 24C. These removals and the planned environmental monitoring, sampling, and testing to be conduced by BEC during the remaining demolition should provide adequate clean up for the planned commercial/industrial usage by the City.

This firm should review the final report after completion of all demolition and remedial activities at the site to evaluate compliance with the goals established in the RAP.

CLOSURE

We trust this evaluation has addressed the needs of the County of San Bernardino County Fire Department, Hazardous Materials Division. If you have any questions or comments regarding this evaluation please do not hesitate to contact this firm at your earliest convenience.

Respectfully submitted,

LOR Geotechnical Group, Inc.

Mathew L. Hunt, REA I 7902

Environmental Scientist

Matter 1 Hent

M. Kevin Osmun, CE 55116

Vice President

MLH:MKO/amp

Distribution: Addressee (2)







UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION IX

75 Hawthorne Street San Francisco, CA 94105

Via Electronic Mail and U.S. Postal Service Mail

September 23, 2011

Keith Rudd Sunkist Growers, Inc. Director of Environmental and Technology 531 W. Poplar Avenue Tipton, CA 93272

Re: Polychlorinated Biphenyls (PCBs) Under Toxic Substances Control Act 40 CFR 761.61(c) – Second Amendment to USEPA-Approved "Remedial Action Plan" for the Former Sunkist Citrus Processing Plant, 616 East Sunkist Boulevard, Ontario, California.

Dear Mr. Rudd:

We are responding to your consultant's (BEC's) September 12, 2011 letter (attached) regarding certain matters related to the cleanup of polychlorinated biphenyls (PCBs) at the former Sunkist Citrus Processing Plant (Sunkist). BEC's letter responds to the U.S. Environmental Protection Agency Region 9's (USEPA's) September 6, 2011 letter conditionally approving the First Amendment to the Remedial Action Plan¹ (TSCA PCB Cleanup Application or Application).

BEC's September 12, 2011 letter proposes additional site characterization and a dust in air concentration for monitoring onsite industrial workers for exposure to PCBs while PCB remedial and concrete crushing activities are ongoing at the Sunkist site. USEPA considers these proposals as modifications to the Application. Herein, USEPA is approving with conditions the proposed modifications to the Application and USEPA's May 22, 2011 letter approving the Application.

USEPA is approving BEC's September 12, 2011 proposals as modified by the conditions of approval established below. This conditional approval is the Second Amendment to the Application and USEPA's May 22, 2011 approval letter.

1. Item 5, Page 6, BEC's Letter. BEC proposes to conduct additional characterization sampling in asphalt and concrete areas around the west, south, and northeast perimeter of the facility. USEPA approves the 1,000 square feet (sq. ft.) sample spacing for sampling asphalt and / or concrete along the west, south, and northeast perimeter of the facility. However, a 10-feet sampling grid spacing will be applied to the Building 52 area and the areas adjacent to and surrounding the Southern

¹ USEPA approved with conditions the "Remedial Action Plan" (RAP) for the Former Sunkist Citrus Processing Plant in Ontario, California (Sunkist Site) dated May 22, 2011 and prepared by BEC for Sunkist Growers, Inc. The RAP serves as the polychlorinated biphenyls (PCB) risk based disposal approval application (Application) required in the Toxic Substances Control Act (TSCA) PCB regulations in 40 CFR 761.61(c). The Application is for the 11.11-acre Sunkist Site located at 616 East Sunkist Boulevard, Ontario, California.

USEPA Conditional Approval Under TSCA, 40 CFR 761.61(c) Remedial Action Plan, Second Amendment Former Citrus Processing Plant, Ontario, California

Date: September 23, 2011

California Edison transformer area. Regardless of which grid size or sample spacing is applied, areas with cracks and stains must be sampled. Any asphalt or concrete with a PCB concentration above the cleanup level must be removed and disposed offsite.

- 2. Item 7, Page 9, BEC's Letter. BEC is proposing to collect a total of 69 soil samples in the area covered by all the concrete stockpiles currently present at the site. USEPA approves this proposal provided a 20-foot x 20-foot sampling grid and random generation of sampling locations within that grid are used to determine the sampling locations for soils beneath the concrete stockpiles after the stockpiles have been removed. Please provide a figure depicting this modification to the figures that BEC submitted in its letter.
- 3. Item 2, Page 13, and Figure 6, BEC's Letter. BEC proposes additional soil sampling locations under PCB impacted concrete and such sampling is depicted in Figure 6 (Soil Sampling Under Impacted Concrete at WWTP) of BEC's letter. USEPA approves the proposed additional soil sampling locations in the WWTP area provided the following additional four samples are collected and analyzed:
 - a. One soil sample northeast and 10 feet diagonally from concrete sampling location "F."
 - b. One soil sample northwest and 10 feet diagonally from concrete sampling location "F."
 - c. One soil sample southeast and 10 feet diagonally from concrete sampling location "T."
 - d. One soil sample southwest and 10 feet diagonally from concrete sampling location "T."
- 4. Item 3, Page 14, BEC's Letter. USEPA approves site real time monitoring activities that are conducted in connection with site cleanups to ensure the public (e.g., nearby residents) is not exposed to site contaminants during site remediation. We noticed that in addition to this type of monitoring, BEC has proposed to monitor PCB containing dust in air to protect industrial workers at the Sunkist site during remediation.

BEC has proposed a 12 milligram/cubic meter (mg/m³) dust concentration in air at the breathing zone for onsite worker protection during remedial and crushing concrete activities.

USEPA's approval of site cleanup plans does not involve approval of worker protection measures that Sunkist may implement at the site during remedial activities. USEPA may make recommendations with respect to these issues and in this instance USEPA recommends that a 0.74 mg/m³ dust concentration be considered as a guideline to monitor onsite workers throughout the course of remedial and concrete crushing activities at the Sunkist site. USEPA derived this dust monitoring level by replacing the NIOSH Recommended Exposure Limit for Aroclor 1254 of 0.001 mg/m³ used in BEC's equation with the USEPA Regional Screening Level for Aroclor 1254 in air of 0.02 ug/m³ for the industrial worker.

USEPA Conditional Approval Under TSCA, 40 CFR 761.61(c) Remedial Action Plan, Second Amendment Former Citrus Processing Plant, Ontario, California Date: September 23, 2011

We look forward to being of assistance during Sunkist / BEC's implementation of the approved PCB cleanup Application as modified by the conditions of approval in USEPA's May 22, 2011 approval letter, September 6, 2011 First Amendment letter, and the conditions herein. Please call Carmen D. Santos at 415.972.3360 if you have any questions concerning this conditional approval.

Sincerely,

Jeff Scott, Director

Waste Management Division

Enclosures (1)

Cc: Charity Hernandez, City of Ontario

Steve Armann, USEPA R9 Carmen Santos, USEPA R9

Bowyer Environmental Consulting



September 12, 2011

VIA ELECTRONIC AND U.S. MAIL

Ms. Carmen Santos Waste Management Division U.S. Environmental Protection Agency Region 9 75 Hawthorne Street San Francisco, CA 94105

Subject:

Response to Conditional Requirements in First Amendment Polychlorinated Biphenyls, Toxic Substances Control Act (40 CFR 761.61(c)) – USEPA Conditional Approval of "Remedial Action Plan"

Former Sunkist Citrus Processing Plant

616 E. Sunkist Street Ontario, California

Dear Ms. Santos:

Bowyer Environmental Consulting, Inc. (BEC) has prepared this response to the United States Environmental Protection Agency (EPA) First Amendment to the conditional approval of the polychlorinated biphenyls (PCBs), Toxic Substances Control Act (40 CFR 761.61(c)) – "Remedial Action Plan" (First Amendment Conditional Approval), which was provided by the EPA on September 6, 2011. The First Amendment Conditional Approval was provided in response to:

- Previous response (BEC, August 31, 2011) to the Conditional approval of the Remedial Action Plan (BEC, May 22, 2011), and Risk Assessment/RAP Review and Additional Action Items (BEC, July 22, 2011); and
- Porous Media Sampling and Removal Action Plan Waste Water Treatment Plant (BEC, September 2, 2011).

The facility which is the subject of theses document and approvals is the former Sunkist Citrus Processing Plant (Sunkist Site), located at 616 E. Sunkist Street in Ontario, California.

In order to document all of the communications related to conditions which are still being finalized, the original condition (EPA, August 19, 2011), initial response (BEC, August 31, 2011), and additional condition (EPA, September 6, 2011) are listed, along with the associated responses, as follows.

- 3. Concrete stockpiles, statistical derivation of an additional number of concrete characterization samples. Within 5 days after the date of this approval, Sunkist/BEC must submit for USEPA approval the revised proposed number of additional concrete samples to be collected from each of several stockpiles (about 21) and building basements at the PCS. These stockpiles are listed in the attached table which is an excerpt from BEC's July 22, 2011 letter (Subject: Risk Assessment / RAP Review and Additional Action Items Former Sunkist Citrus Processing Plant...). Properly applied SW-846 statistical methodology shall be employed to calculate the number of additional concrete samples. The approved cleanup level of 4.5 mg/kg PCBs shall be used as the regulatory threshold (RT) instead of the 1 mg/kg RT used in the calculations presented in BEC's July 22, 2011 letter. Based on the above, USEPA is requiring that Sunkist/BEC conduct the following steps:
 - a. Sunkist/BEC must use the existing data and the current version of ProUCL to separately calculate the distribution-specific 95% upper confidence limit (UCL) on the mean concentration for each stockpile. Stockpiles with UCLs above 4.5 mg/kg PCBs shall be disposed offsite to prevent any exposures to PCBs contained in the concrete from these stockpiles in the future.
 - b. For the stockpiles not identified for disposal in Condition C.3.a ("the remaining stockpiles"), the existing concrete stockpile data may be insufficient as to justify onsite use of the remaining concrete. Sunkist/BEC must conduct additional sampling of those stockpiles. The existing data for the remaining stockpiles shall be used to derive the number of additional concrete characterization samples needed for each of the remaining stockpiles using the statistical method specified in SW-846 and a regulatory

threshold of 4.5 mg/kg and not of 1 mg/kg. A random sampling approach shall be used to collect the additional concrete samples needed from each remaining stockpile.

c. Sunkist/BEC shall use the existing PCB characterization data for the remaining stockpiles together with the new data (required in Condition C.3.b) and the current version of ProUCL to calculate a separate UCL for each remaining stockpile. Sunkist/BEC must dispose offsite any stockpiles with a UCL above the 4.5 mg/kg PCB cleanup level (regulatory threshold).

Sunkist/BEC proposed in Section 3.1 (PCB Removals) of the RAP to remove for offsite disposal the crushed concrete in Basement 21, and in stockpiles W-N, D, 10, 16, 17, and 18 (including 18a and 18b). USEPA approves the offsite disposal of the concrete in Basement 21 and in the mentioned stockpiles in context to the approved PCB cleanup level of 4.5 mg/kg.

Please note that, per the specified response schedule (" within 5 days after the date of the approval"), this response was provided previously via an email from Brett Bowyer of BEC to Carmen Santos and Steve Armann of the USEPA on August 25, 2011. Sunkist/BEC is in agreement with this comment and is providing the additional information and plans as part of this response. Please note that following the additional sampling of the crushed concrete stockpiles per the previously submitted plan (BEC, July 22, 2011), Sunkist made a decision to remove select stockpiles from the Site that we believed would not meet the revised cleanup criteria. The removed crushed concrete stockpiles included, Stockpiles 10, 14, 15, 16, 17 and W-N. In addition, the crushed concrete in Basement 21 is in the process of being removed from the Site. All of this material is being properly disposed of off-Site. Documentation regarding the disposed volumes and disposal facility information will be provided in the Completion Report. The approximate former location of these stockpiles, and of the remaining stockpiles and filled basements are shown on the attached Figure 1.

> As per the requirements specified above, BEC performed additional statistical evaluations for the remaining twelve stockpiles of crushed concrete (Stockpiles 11, 12, 13, 18, 19, 20, 21, A, B, C, D and W-S) and two filled basements (Basement 11 and 64). This evaluation was performed per the methods specified in SW-846 (utilizing the 4.5 mg/kg cleanup value as the regulatory threshold, and the specific data previously collected from each stockpile and/or basement) to determine the appropriate number of additional samples necessary to complete the characterization of each of the stockpiles and/or basements. The evaluation is provided in Attachment A. As shown, the re-evaluation of the stockpiles specific data utilizing 4.5 mg/kg as the regulatory threshold found that sufficient data was available to characterize each of the stockpiles/basements except for Stockpile D. The SW-846 evaluation determined that thousands of samples would need to be collected from Stockpiles D in order to complete the characterization. In addition, based on the current dataset, the ProUCL calculation for Stockpile D is 6.35 mg/kg. Given these conditions, it has been decided that Stockpile D will be disposed of off-Site. Documentation regarding the final deposition of Stockpile D will be provided in the Completion Report.

> An evaluation of the UCL for Stockpiles 11, 12, 13, 18, 19, 20, 21, A, B, C, and W-S, and for Basement 11 and 64 has been conducted, as provided in Attachment A. As shown the ProUCL estimate for each of these stockpiles and basements is less than the approved 4.5 mg/kg cleanup value. Based on the additional evaluations conducted here, Stockpiles 11, 12, 13, 18, 19, 20, 21, A, B, C and W-S will be utilized to fill low spots and as road base on the Site.

Additional EPA Comment 1: Condition C.3 (Concrete stockpiles, statistical derivation of an additional number of concrete characterization samples). As indicated in our September 2, 2011 electronic mail (e-mail) message the statistical analysis of the concrete stockpile data presented in your letter satisfies the requirements in Condition 3. In addition, we agree that Stockpile D must be disposed of offsite. Please provide the name of the disposal site to where the entire contents of Stockpile D will be disposed of.

Stockpile D was transported and disposed of as remediation waste with less than 50 milligrams per kilogram (mg/kg) of PCBs at the Simi Valley Waste Management landfill in Simi Valley, California.

- 4. Basement 21 Removal Action (Section 4.2.1 of the RAP) and similar removal actions at other former Sunkist building basements. USEPA approves of the proposed remedial action as modified by this condition below and Condition C.3 above. USEPA is approving under 40 CFR 761.61 (a) the soil sampling to be conducted in Basement 21 and any other basement from which crushed concrete will be removed.
 - a) Crushed concrete containing PCBs above the cleanup level has been placed in the basement of former Building 21. After the crushed concrete is removed from the basement, Sunkist/BEC proposes to collect composite soil samples following the procedures in 40 CFR 761.289(b)(1)(i). However, those sampling procedures do not apply. Instead, Sunkist/BEC shall collect the composite soil samples following the sampling approach in 40 CFR 761.289(b)(1)(ii), (b)(1)(ii)(A), (b)(1)(ii)(B), and (b)(1)(ii)(C) or equivalent method. Within 10 days after the date of this approval, Sunkist/BEC shall resubmit Figure 10 depicting the soil sampling locations in the Building 21 basement and such locations shall be determined based on the sampling method in this regulation.

As per our discussion on August 24, 2011, it was agreed that despite the fact that the presence of the crushed concrete in Basement 21 met the regulatory description provided in 40 CFR 761.289(b)(1)(ii), (b)(1)(ii)(A), (b)(1)(ii)(B), and (b)(1)(ii)(C), the data generated by collecting composite soil samples following the procedures in 40 CFR 761.289(b)(1)(i) would be more practical in this case. As a result, it is our understanding that the approach presented in the RAP is to be approved, and there is no need to provide a revised version of Figure 10.

Additional EPA Comment 2: Condition C.4 (Basement 21 Removal Action [Section 4.2.1 of the RAP] and similar removal actions at

other former Sunkist building basements). USEPA has reconsidered Condition C.4. In reference to sampling of soils in Basement 21, USEPA hereby modifies Condition C.4 by approving the approach proposed by Sunkist/BEC in the Application which is illustrated in Figure 10. Sunkist/BEC do not need to submit a revised Figure 10.

Agreed and Noted.

5. Stockpile Sampling and Off-Site Disposal (Section 4.2.2 of the RAP).

Sampling of concrete from building basements and in above ground stockpiles must be conducted consistent with the method established in Condition C.3 above.

Agreed and Noted. The stockpiles generated through the demolition of Buildings 12 and 15 will be crushed and sampled on a random basis. The appropriate number of samples will be defined based on SW-846 methodology and the UCL will be determined based on the data set. The UCL will be compared to the cleanup value (4.5 mg/kg). If the UCL is less than the 4.5 mg/kg than it will be utilized on-Site as fill and/or road base. If the UCL is greater than 4.5 mg/kg it will be properly disposed of off-Site.

Additional EPA Comment 3: Condition C.5 (Stockpile Sampling and Off-Site Disposal (Section 4.2.2 of the RAP). Condition C.5 applies to existing concrete stockpiles and to stockpiles that may be generated as a result of removing from inside building basements crushed concrete that is already located inside the basements. Condition C.5 does not approve or facilitate generation of new concrete stockpiles except those stockpiles that may be generated due to the reasons explained above. If Buildings 12 and 15 have not been demolished yet, proper characterization of the concrete floors shall be conducted prior to demolition of those buildings to ensure that concrete to be crushed does not exceed the 4.5 mg/kg approved PCB cleanup level. Sunkist/BEC shall propose the sampling approach for concrete characterization before demolition of buildings and other concrete structures to be crushed.

Other than the concrete associated with Buildings 12, 15 and 31 and the Wastewater Treatment Plant (WWTP), the other known concrete and other

porous media in place is present along the eastern, southern and northern margins of the Site, in one east-west roadway structure, and as a slab that formerly underlay Stockpiles W-N and W-S. The areas of known remaining subsurface concrete and other porous media (primarily asphalt) are shown on Figure 1. The in situ sampling plan for these areas is described as follows.

Sampling will be performed consistent with the Region 1 Standard Operation Procedures for Sampling of Porous Media which recommends:

- Sampling of stained areas (at least 3 samples of each porous material present in each area); and
- Where PCBs equipment was used or where PCBs were stored, sample at a frequency of 1 sample every 100 square feet (ft²).

In addition, areas that do not exhibit the above-referenced conditions will be sampled on a systematic basis at an interval of no less than 1 sample for every 1,000 ft².

If any areas exhibit impacts at levels that exceed the approved PCB cleanup level (4.5 mg/kg) these areas will be cut out, separated and properly disposed of off Site. The remaining non-impacted porous material will be crushed and reused at the Site. Crushing and all other construction-related activities will be subject to the dust monitoring and management procedures as discussed in the proceeding sections.

6. Basement 31 Porous Material Sampling (Section 4.2.3 of the RAP). USEPA approves of the sampling approach proposed for the concrete floor in Basement 31 provided the basement is not filled with bulk concrete (crushed or uncrushed). Soil samples shall be collected at concrete sampling locations where PCBs are equal to or higher than 4.5 mg/kg PCBs. One additional soil sample shall be collected in the lift L-42 area for a minimum of three soil samples to be collected from that area for PCB analysis. In addition, if the Basement 31 is filled with bulk concrete, the floor of this basement shall be sampled following the requirement in Condition C.4 above.

> The additional sample will be collected at L-42. However, as the City (property buyer) does not want this concrete feature to remain at the current depth, the basement floor at Building 31 will be removed during demolition. As it is no longer planned to leave the basement in place, the sampling approach proposed in the RAP is no longer applicable. It is now planned that this concrete will be removed and crushed along with the rest of Building 31. The stockpiles generated through the demolition of Buildings 31 (including the basement) will be crushed and sampled on a random basis. The appropriate number of samples will be defined based on SW-846 methodology and the UCL will be determined based on the data set. The UCL will be compared to the cleanup value (4.5 mg/kg). If the UCL is less than the 4.5 mg/kg than it will be utilized on-Site as fill and/or road base. If the UCL is greater than 4.5 mg/kg it will be properly disposed of off-Site. It should be noted that the only material that will be utilized for fill and/or road base will be analyzed by the above-described approved methods involving the comparison of the UCL to the cleanup criteria. Material that does not exhibit an UCL of less than 4.5 mg/kg will not be utilized (at Basement 31 or anywhere else on the Site) as fill, or for any other purpose. As a result, only Basement 21, or soil under former stockpiles that exhibited PCB concentrations of greater than 4.5 mg/kg (See Comment No. 7), will need to be sampled to confirm that the unacceptable material has been removed. As such, no additional sampling of the subsurface after the removal of the concrete floor from Basement 31 is necessary (other than at the lifts).

> Any additional concrete at the Site generated during the additional demolition will be evaluated by the approved procedures to determine if it can be reused as fill and/or road base, or needs to be disposed off-Site (UCL of greater than 4.5 mg/kg). For instance, the foundation of the Wastewater Treatment Plant (WWTP) has been sampled as presented in the Porous Media Sampling and Removal Action Plan - Wastewater Treatment Plant (BEC, August 29, 2011). As described in this document, areas that exhibited PCB concentrations of greater than 4.5 mg/kg are to be cut out and properly disposed of off-Site. The remaining foundation material will be crushed, and an appropriate number of random samples (per SW-846) will be collected and statistically evaluated to determine

the UCL. If the UCL for this material is less than the cleanup criteria (4.5 mg/kg) than the material will be reused at the Site a fill and/or road base. If the material has an UCL of greater than 4.5 mg/kg it will be properly disposed of off-Site.

Additional EPA Comment 4: Condition C.6 (Basement 31 Porous Material Sampling [Section 4.2.3 of the RAP]). The City of Ontario no longer wants to keep the Building 31 basement. Sunkist/BEC has proposed to remove the concrete floor from the basement in Building 31 and to crush the floor with the rest of Building 31. A Building 31 concrete stockpile would be created. Sunkist/BEC proposes not to sample the concrete floor before demolition and is requesting that USEPA modify Condition C.6. USEPA is not modifying Condition C.6. The requirements in Condition C.6 remain unchanged and shall be implemented as established in USEPA's August 19, 2011 conditional approval letter. In addition refer to Condition C.5 in Item 3 above. The TSCA regulations require in-situ sampling.

Agreed and Noted.

7. Soil beneath concrete stockpiles. Sunkist/BEC must sample surface soils (0 to 3 inches below ground surface) beneath all the concrete stockpiles to verify that PCBs are not present above the approved PCB cleanup level. Within 10 days after the date of this approval, Sunkist/BEC shall submit for review and approval the sampling approach to make this verification.

Agreed and Noted. This requirement applies to stockpiles that contained PCB concentrations of greater than 4.5 mg/kg. As such, soil samples will be collected at 0-3 inches below ground surface under and near Stockpiles W-N, W-S, A, C, D, 10, 13, 14, 15, 16, 17 and 18. Samples will not be collected from Stockpiles B, 11, 12, 19, 20 and 21 as discrete samples of greater than 4.5 mg/kg were not observed in these stockpiles. The sampling areas with respect to the Stockpiles, and Site in general, are shown on Figure 1. Specific plans for the sample collection are shown on Figures 2 through 4. As shown, the total area associated with this sampling program is over 1.2 acres in size. As such, the compositing areas have been modified to include up to 36 discrete samples per area for the larger areas. In total, the planned program involves the analysis of 43 composited samples. Each of these samples will be analyzed for

PCBs by the methods specified in Comment No. 11.

Additional EPA Comment 5: Condition C.7 (Soil beneath concrete stockpiles). No, the requirements in Condition C.7 apply to all concrete stockpiles. Therefore, soils beneath all stockpiles shall be properly characterized for PCBs and sample collection conducted as required in Condition C.7.

Given the size of the area underlying all of the stockpiles (approximately 1.5 acres) the implementation of sampling by the procedures defined in 40 CFR 761.289(b)(1)(i) and/or 40 CFR 761.289(b)(1)(ii), (b)(1)(ii)(A), (b)(1)(ii)(B), and (b)(1)(ii)(C) would require the collection of over two thousand individual samples that would then be composited into a series of samples for analysis. It would take a two man crew approximately 15 days to implement this type of sampling program. Given the size of the area to be evaluated, BEC is recommending that a discrete sampling program be implemented as an equivalent method. The scope of the discrete sampling program is defined on Figures 2 through 5. As shown, this sampling approach will result in the analysis of 69 discrete soil samples from throughout the entire area under the former crushed concrete stockpiles. The data generated via this approach is equivalent to that that would be generated by the procedures defined in 40 CFR 761.289(b)(1)(i) and/or 40 CFR 761.289(b)(1)(ii), (b)(1)(ii)(A), (b)(1)(ii)(B), and (b)(1)(ii)(C).

11. Extraction and analytical methods. Field and laboratory quality control samples. Under the TSCA PCB regulations the applicant has the option to choose either the Soxhlet extraction method (USEPA Method 3540C) or the Ultrasonic method (USEPA Method 3550C). The Soxhlet extraction method is preferred by USEPA or both concrete and soil samples. If necessary, post extraction and pre-analysis sample cleanup (e.g., USEPA Methods 3665A [sulfuric acid], 3620C [florisil column], 3640A [Gel Permeation Column, GPC]) procedures must be considered if matrix interferences are suspected that could increase analytical method detection limits and compromise comparisons of analytical results to the cleanup levels required in this approval.

Within five (5) days after the date of this approval and before starting sampling at the PCS Sunkist/BEC shall submit a description of quality control (QC) procedures that will be implemented in the field during sample collection (characterization and cleanup verification sampling) and number and type of field QC (e.g., duplicates) samples to be collected for soil and concrete. This description shall also identify the laboratory QC samples (i.e., surrogate spikes, matrix spikes, equipment blanks) that will be prepared and analyzed by the contracted analytical laboratory together with the site samples.

Please note that, per the specified response schedule ("within 5 days after the date of the approval"), this response was provided previously via an email from Brett Bowyer of BEC to Carmen Santos and Steve Armann of the USEPA on August 25, 2011. Agreed and Noted. As specified in the Sampling and Analysis Plan (SAP) that was submitted (Appendix D) as part of the RAP (BEC, May 22, 2011) the following QA/QC samples will be collected:

- Field Duplicates Field duplicate samples will be collected at a
 minimum frequency of 1 for every 20 samples collected. Duplicate
 samples will be independently collected as close as possible to the
 original sample from the same source under identical sampling
 conditions. The field duplicate samples will be uses to document
 sampling and analytical precision.
- Equipment Rinsate Blanks Equipment rinseate blanks will be collected to evaluate field sampling and decontamination procedures by pouring water (for soil and stockpile sampling) or hexane (for porous material sampling) over the decontaminated equipment, following sample collection. In general, equipment blanks will be collected at a rate of 1 in 20 (minimum of one per day).
- Matrix Spike and Matrix Spike Duplicate (MS/MSD) In general, for every 20 field samples, one location will have sample volume collected in triplicate and will be designated on the chain-ofcustody form as an MS/MSD.

> Surrogate Analysis – ABC will analyze surrogates with each of the analyses performed. For the 8082 analysis, the laboratory utilizes 2,4,5,6-tetrachloro-m-xylene and decachlorobihenyl as surrogates. The recoveries of these compounds will be reported on the laboratory reports.

Additional EPA Comment 6: Condition C.11 (Extraction and analytical methods). Regarding this issue, one field duplicate sample should be collected every ten (10) samples and not every 20 samples as indicated in the message. Please adjust the number of field duplicate samples.

Agreed and Noted.

14. Areas investigated for non-PCB contamination (Section 4.3 [Non-TSCA Related Soil Removal Activities] of the RAP). Sunkist/BEC have indicated the source of PCBs at the Sunkist Site is unknown. Investigations for non-PCB contaminants have occurred in Area 24C, Area D-5-1, Area L-13-3, Area B-5-1, and Area D-1-1 (collectively referred to as "Non-PCB Areas") and petroleum hydrocarbons and polyaromatic hydrocarbons (PAHs) are present at some of these areas. Given Sunkist's uncertainty on the source of PCBs and the presence of PAHs and petroleum hydrocarbons, USEPA is requesting that cleanup verification sampling to be conducted in the "Non-PCB Areas" include testing for PCBs. Within 15 days after the date of this letter propose the number of soil samples that Sunkist/BEC will collect to demonstrate PCBs are not present in the "Non-PCB Areas" in concentrations above the USEPA-approved PCB cleanup level.

Please note that, this response was provided previously via an email from Brett Bowyer of BEC to Carmen Santos and Steve Armann of the USEPA on August 25, 2011. The non-PCB areas were relatively small and all but one of these areas (24C) had one or two previous samples collected and analyzed for PCBs. The results of the previous analyses, along with plans for additional sample collection and analysis are provided on the attached Figures 5 through 9. Please concur or provide comment on these proposed plans as soon as possible, as the proposed sampling has already been implemented in order to meet the critical project schedule.

Additional EPA Comment 7: Condition C.14 (Areas investigated for non-PCB contamination (Section 4.3 [Non-TSCA Related Soil Removal Activities] of the RAP). USEPA and BEC have discussed the sampling proposed at the "non-PCB" areas. USEPA concurs with the sampling proposed by Sunkist/BEC and Sunkist/BEC shall conduct the sampling as described in the attached Figures 1 (Additional PCB Sampling Plan Area B-5-1), 2 (Additional PCB Sampling Plan Area D-1-1), 6 (Additional PCB Sampling Plan Area 24C).

Agreed and Noted.

The EPA Comments to the Porous Media Sampling and Removal Action Plan – Waste Water Treatment Plant (BEC, September 2, 2011) and BEC's comments are provided in the following.

1. **Proposed concrete sampling at Waste Water Treatment Plant** (WWTP). USEPA concurs with the revised sampling plan for concrete located in the WWTP. Concrete sampling must be conducted prior to demolition in accordance with all applicable conditions in USEPA's August 19, 2011 letter approving the Application and the attached Figure 3 (Planned Additional Sampling Wastewater Treatment Plant). USEPA and BEC discussed and agreed to the additional concrete sampling at the WWTP on September 1 and 2, 2011.

Agreed and Noted.

2. **Proposed soil sampling at WWTP.** USEPA is approving the proposed soil sampling beneath the concrete found to be contaminated with PCBs at the WWTP provided that one additional soil sample be collected 10 feet to the west of the soil sample location proposed outside the concrete area to be cut out and disposed of offsite as "non-TSCA" waste. The attached Figure 7 (Soil Sampling Under Impacted Concrete at WWTP) describes additional soil sampling to be conducted beneath concrete based on currently available concrete sampling results. Depending on the results of the additional concrete sampling to be conducted as required in Condition B.1 above, additional soil samples may be required.

Agreed and Noted. Please see the attached Figure 6, which shows the location of the additional soil sample.

3. **Dust monitoring and suppression.** USEPA concurs with Sunkist/BEC's calculations that dust in ambient air shall not exceed 12 micrograms per cubic meter (ug/m3) during demolition and remedial activities. Dust suppression must not generate runoff at the Site and if runoff is generated such runoff must be properly contained and the water tested for PCBs. Depending on the PCB concentration, the water may be used for unrestricted use in accordance with 40 CFR 761.79 (b)(1)(iii).

Please note that based on the previously submitted Dust Management Plan there are two proposed risk-based dust monitoring trigger levels that are based on the types of potential exposure routes present at the Site. These levels are:

- Off-Site Residents 0.159 milligrams per cubic meter (mg/m³) at the fence line; and
- On-Site Workers 12 mg/m³ anywhere on the Site.

As stated in the subject documents fence line dust monitoring will be implemented to evaluate the potential for off-Site receptors (including residential) to be impacted. If at any time fence line monitoring indicates greater than 0.159 mg/m³ of dust than immediate additional dust suppression procedures will be implemented and/or work will be halted until the dust levels at the fence line are reduced to below 0.159 mg/m³. The second trigger level is protective of on-Site workers. In order to monitor this condition, breathing zone dust measurements (within the work areas) will be monitored. If at any time breathing zone monitoring indicates greater than 12.0 mg/m³ of dust than immediate additional dust suppression procedures will be implemented and/or work will be halted until the dust levels at the breathing zone are reduced to below 12 mg/m³. Documentation regarding the derivation of these risk-based triggers, that demonstrate that these levels are conservative and protective, has been previously provided in the Dust Management Plan. A copy of this document is provided again as Attachment A. As shown, there were never any risk-based calculations that supported a 12 micrograms per cubic meter (ug/m³) trigger level. The preceding documents did contain a typo which mistakenly stated 12 ug/m³ as a trigger level. However this was a typo, which should have

stated 12 mg/m³, as documented and supported in the original and attached Dust Management Plan.

As we have relayed previously, there is a need to meet critical schedule conditions associated with this project. As such, we would appreciate your concurrence to these responses as soon as possible. If there is a need to confer regarding these responses, please contact us at 877-232-4620 at your earliest possible convenience.

Sincerely,

Heriberto Robles, Ph.D., D.A.B.T.

H.T. RA

Senior Technical Consultant

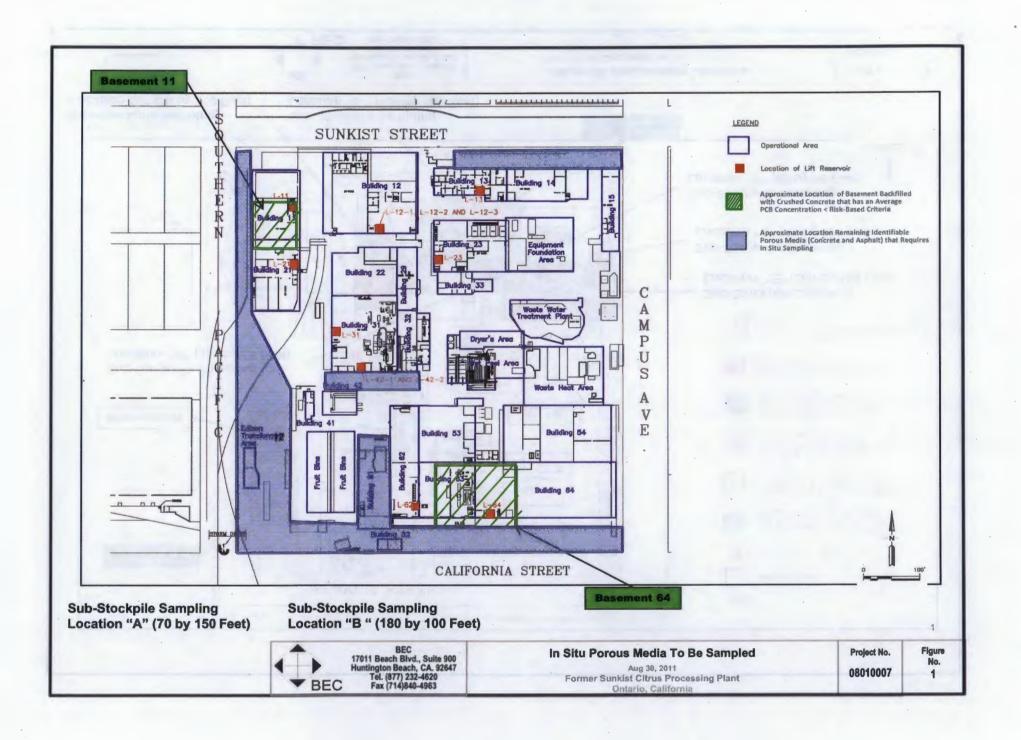
Bowyer Environmental Consulting, Inc.

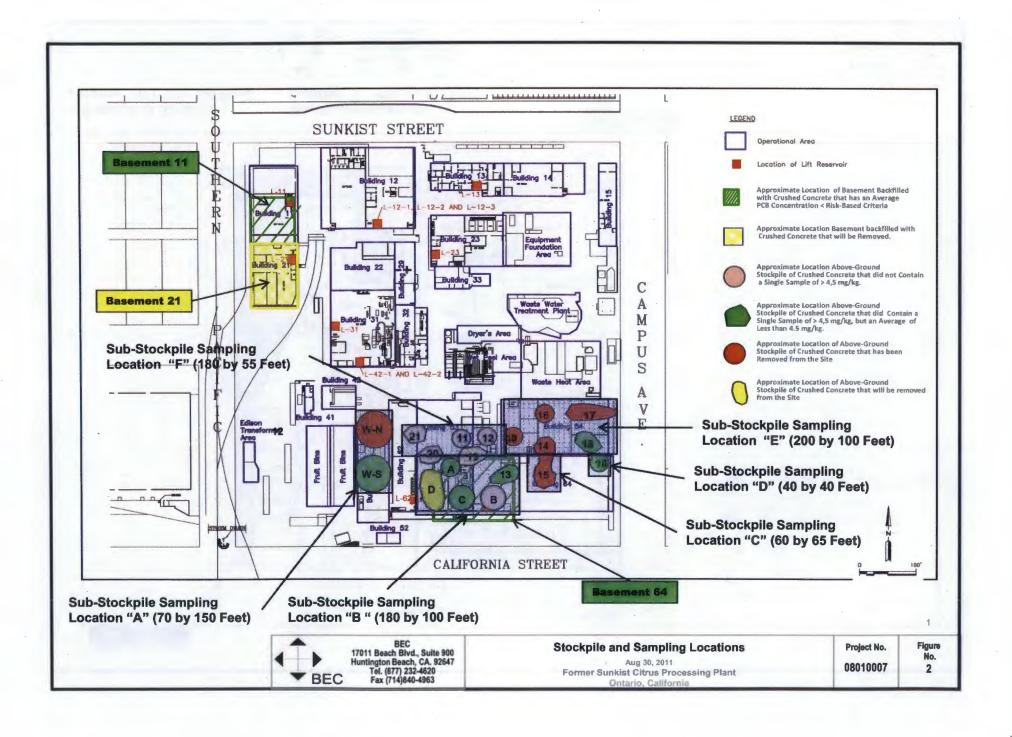
Brett H. Bowyer, P.G.

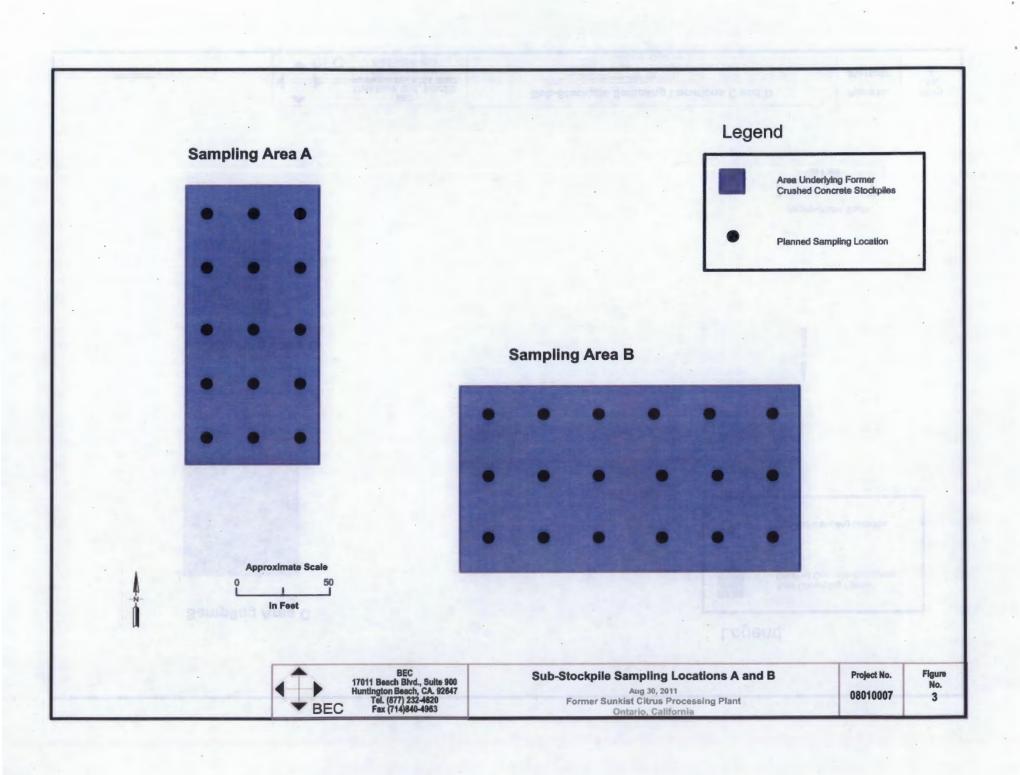
Principal

Bowyer Environmental Consulting, Inc.

Figures

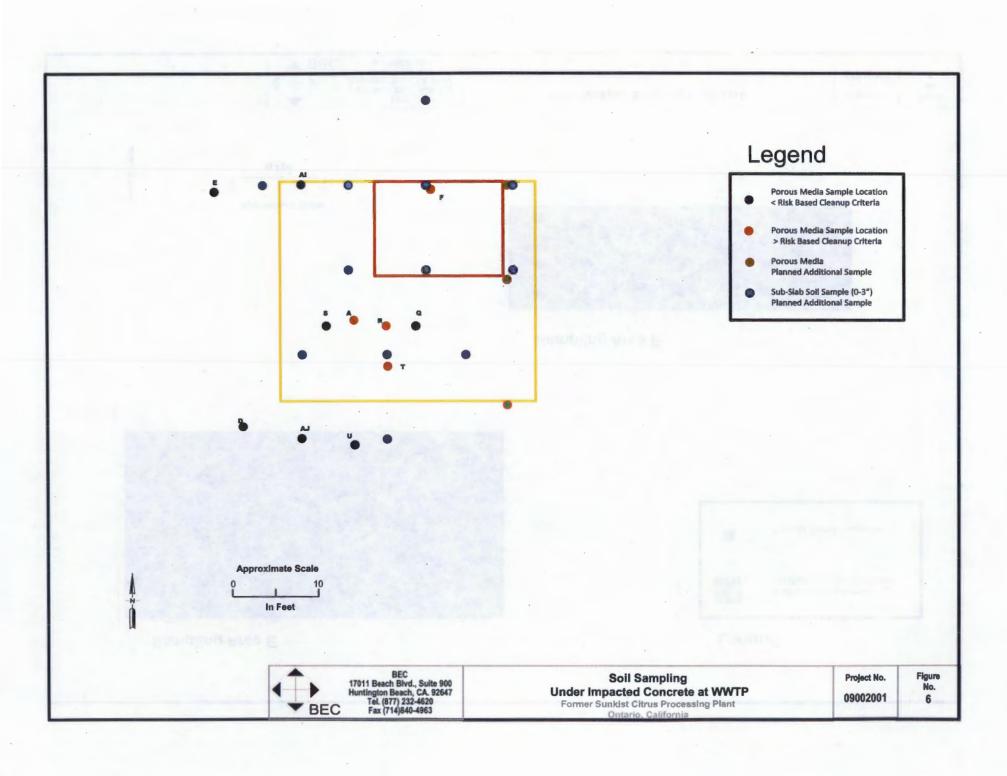






Legend Sampling Area C Area Underlying Former Crushed Concrete Stockpiles **Planned Sampling Location** Sampling Area D **Approximate Scale** In Feet BEC 17011 Beach Blvd., Suite 900 Huntington Beach, CA. 92647 Tel. (877) 232-4620 Fax (714)840-4963 Project No. Figure Sub-Stockpile Sampling Locations C and D No. Aug 30, 2011 Former Sunkist Citrus Processing Plant Ontario, California 08010007 4

Sampling Area E Legend Area Underlying Former Crushed Concrete Stockpiles **Planned Sampling Location** Sampling Area F **Approximate Scale** In Feet BEC 17011 Beach Blvd., Sulte 900 Huntington Beach, CA. 92647 Tel. (877) 232-4620 Fax (714)840-4963 Sub-Stockpile Sampling Location E Aug 30, 2011 Former Sunkist Citrus Processing Plant Ontario, California Figure No. Project No. 08010007 5 BEC



Attachment A

Dust Management Plan

Ambient air will be monitored for the presence of dust throughout active demolition and/or grading operations. Activities monitored will include, but not be limited to crushing of concrete, demolition of above and/or below ground structures, movement of materials, and grading.

The dust measurements will be collected during these activities using a Thermo MIE pDR-1000 DataRam. Measurements will be collected downwind, upwind and within working zones. At a minimum, one measurement will be collected every 15 minutes during ongoing operations. Additional dust measurements will also be obtained along the western fence line to evaluate the potential for dust to migrate off-Site to the nearby residential properties.

The following sections describe the method utilized to derive action levels associated with the dust monitoring program and mitigation measures that will be taken to limit the amount of dust generated.

Dust Action Level Calculation for the Protection of Onsite Workers

Aroclor 1254 been detected in crushed concrete and soil at the Site. The NIOSH Recommended Exposure Limit (REL) for Aroclor 1254 is 0.001 milligrams per cubic meter (mg/m³). The REL is a time-weighted average (TWA) concentrations for up to a 10-hour workday during a 40-hour workweek, above which inhalation is considered by NIOSH to be a concern. Data collected from soil and crushed concrete samples has detected Aroclor 1254 at up to 27 mg/kg. By conservatively assuming that all dust generated at the Site has an Aroclor 1254 concentration of 27 milligrams per kilogram (mg/kg), the amount of dust in air required to hold no more than 0.001 mg of Aroclor 1254 has been calculated (37.0 milligrams). As such, the conservative dust action level for the protection of onsite workers has been calculated at 37.0 mg/m³. As this number is likely to allow for the presence of significant visible dust, an even more conservative action level of 12 mg/m³ has been established for all work zones at the Site.

Dust Action Level Calculation for the Protection of Offsite Residents

A conservative evaluation of the action level for off-Site dust to residences

was calculated based on the most elevated concentration of PCBs in crushed concrete, and the concentration in air that is protective of residential receptors per the EPA Regional Screening Levels (RSLs) table. According to the RSL table, an Aroclor 1254 concentration in air equal to 4.3E-03 ug/m³ is protective of residential receptors. Data collected from crushed concrete samples has detected Aroclor 1254 at up to 27 mg/kg (please note that the limited area of uncrushed concrete on the WWTP that contained up to 66.6 mg/kg of Aroclor 1260 will not be crushed and it is not likely that a significant amount of dust will be generated during the removal of this material). Assuming all dust generated at the Site had an Aroclor 1254 concentration of 27 mg/kg, the amount of dust in air required to hold no more than 4.3E-03 micrograms of Aroclor 1254 is 0.159 milligrams. Thus, the conservative dust action level for the protection of off-Site residential receptors is 0.159 mg/m³.

Mitigation Measures

At any time during these monitoring activities bulk dust concentrations in excess of 12 mg/m³ are measured, work will be halted and additional dust suppression activities will be implemented until the conditions are abated. In addition, if at any time bulk dust concentrations in excess 0.159 mg/m³ are observed along the western fence line due to on-Site activities, work will be halted and additional dust suppression activities will be implemented. These additional dust suppression activities will involve the application of additional water or dust suppression agent such as SoilTac tm or Gorilla Snottm, if necessary.



75 Hawthorne Street San Francisco, CA 94105

Via Electronic Mail and U.S. Postal Service Mail

September 23, 2011

Keith Rudd Sunkist Growers, Inc. Director of Environmental and Technology 531 W. Poplar Avenue Tipton, CA 93272

Re: Polychlorinated Biphenyls (PCBs) Under Toxic Substances Control Act 40 CFR 761.61(c) – Second Amendment to USEPA-Approved "Remedial Action Plan" for the Former Sunkist Citrus Processing Plant, 616 East Sunkist Boulevard, Ontario, California.

Dear Mr. Rudd:

We are responding to your consultant's (BEC's) September 12, 2011 letter (attached) regarding certain matters related to the cleanup of polychlorinated biphenyls (PCBs) at the former Sunkist Citrus Processing Plant (Sunkist). BEC's letter responds to the U.S. Environmental Protection Agency Region 9's (USEPA's) September 6, 2011 letter conditionally approving the First Amendment to the Remedial Action Plan¹ (TSCA PCB Cleanup Application or Application).

BEC's September 12, 2011 letter proposes additional site characterization and a dust in air concentration for monitoring onsite industrial workers for exposure to PCBs while PCB remedial and concrete crushing activities are ongoing at the Sunkist site. USEPA considers these proposals as modifications to the Application. Herein, USEPA is approving with conditions the proposed modifications to the Application and USEPA's May 22, 2011 letter approving the Application.

USEPA is approving BEC's September 12, 2011 proposals as modified by the conditions of approval established below. This conditional approval is the Second Amendment to the Application and USEPA's May 22, 2011 approval letter.

1. Item 5, Page 6, BEC's Letter. BEC proposes to conduct additional characterization sampling in asphalt and concrete areas around the west, south, and northeast perimeter of the facility. USEPA approves the 1,000 square feet (sq. ft.) sample spacing for sampling asphalt and / or concrete along the west, south, and northeast perimeter of the facility. However, a 10-feet sampling grid spacing will be applied to the Building 52 area and the areas adjacent to and surrounding the Southern

¹ USEPA approved with conditions the "Remedial Action Plan" (RAP) for the Former Sunkist Citrus Processing Plant in Ontario, California (Sunkist Site) dated May 22, 2011 and prepared by BEC for Sunkist Growers, Inc. The RAP serves as the polychlorinated biphenyls (PCB) risk based disposal approval application (Application) required in the Toxic Substances Control Act (TSCA) PCB regulations in 40 CFR 761.61(c). The Application is for the 11.11-acre Sunkist Site located at 616 East Sunkist Boulevard, Ontario, California.

USEPA Conditional Approval Under TSCA, 40 CFR 761.61(c) Remedial Action Plan, Second Amendment Former Citrus Processing Plant, Ontario, California

Date: September 23, 2011

California Edison transformer area. Regardless of which grid size or sample spacing is applied, areas with cracks and stains must be sampled. Any asphalt or concrete with a PCB concentration above the cleanup level must be removed and disposed offsite.

- 2. Item 7, Page 9, BEC's Letter. BEC is proposing to collect a total of 69 soil samples in the area covered by all the concrete stockpiles currently present at the site. USEPA approves this proposal provided a 20-foot x 20-foot sampling grid and random generation of sampling locations within that grid are used to determine the sampling locations for soils beneath the concrete stockpiles after the stockpiles have been removed. Please provide a figure depicting this modification to the figures that BEC submitted in its letter.
- 3. Item 2, Page 13, and Figure 6, BEC's Letter. BEC proposes additional soil sampling locations under PCB impacted concrete and such sampling is depicted in Figure 6 (Soil Sampling Under Impacted Concrete at WWTP) of BEC's letter. USEPA approves the proposed additional soil sampling locations in the WWTP area provided the following additional four samples are collected and analyzed:
 - a. One soil sample northeast and 10 feet diagonally from concrete sampling location "F."
 - b. One soil sample northwest and 10 feet diagonally from concrete sampling location "F."
 - c. One soil sample southeast and 10 feet diagonally from concrete sampling location "T."
 - d. One soil sample southwest and 10 feet diagonally from concrete sampling location "T."
- 4. Item 3, Page 14, BEC's Letter. USEPA approves site real time monitoring activities that are conducted in connection with site cleanups to ensure the public (e.g., nearby residents) is not exposed to site contaminants during site remediation. We noticed that in addition to this type of monitoring, BEC has proposed to monitor PCB containing dust in air to protect industrial workers at the Sunkist site during remediation.

BEC has proposed a 12 milligram/cubic meter (mg/m³) dust concentration in air at the breathing zone for onsite worker protection during remedial and crushing concrete activities.

USEPA's approval of site cleanup plans does not involve approval of worker protection measures that Sunkist may implement at the site during remedial activities. USEPA may make recommendations with respect to these issues and in this instance USEPA recommends that a 0.74 mg/m³ dust concentration be considered as a guideline to monitor onsite workers throughout the course of remedial and concrete crushing activities at the Sunkist site. USEPA derived this dust monitoring level by replacing the NIOSH Recommended Exposure Limit for Aroclor 1254 of 0.001 mg/m³ used in BEC's equation with the USEPA Regional Screening Level for Aroclor 1254 in air of 0.02 ug/m³ for the industrial worker.

USEPA Conditional Approval Under TSCA, 40 CFR 761.61(c) Remedial Action Plan, Second Amendment Former Citrus Processing Plant, Ontario, California Date: September 23, 2011

We look forward to being of assistance during Sunkist / BEC's implementation of the approved PCB cleanup Application as modified by the conditions of approval in USEPA's May 22, 2011 approval letter, September 6, 2011 First Amendment letter, and the conditions herein. Please call Carmen D. Santos at 415.972.3360 if you have any questions concerning this conditional approval.

Sincerely,

Jeff Scott, Director Waste Management Division

Enclosures (1)

Cc: Charity Hernandez, City of Ontario

Steve Armann, USEPA R9 Carmen Santos, USEPA R9

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U.S. EPA CONCURRENCES

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75 Hawthorne Street San Francisco, CA 94105

Via Electronic Mail and U.S. Postal Service Mail

September 6, 2011

Keith Rudd
Sunkist Growers, Inc.
Director of Environmental and Technology
531 W. Poplar Avenue
Tipton, CA 93272

Re: Polychlorinated Biphenyls (PCBs) Under Toxic Substances Control Act 40 CFR 761.61(c) – First Amendment to USEPA-Approved "Remedial Action Plan" for the Former Sunkist Citrus Processing Plant, 616 East Sunkist Boulevard, Ontario, California.

Dear Mr. Rudd:

This letter responds to your consultant's (BEC's) August 31 and September 2, 2011 letters regarding certain matters related to the PCB cleanup at the former Sunkist Citrus Processing Plant (Sunkist). BEC's August 31, 2011 letter responded to the U.S. Environmental Protection Agency Region 9's (USEPA's) August 19, 2011 letter conditionally approving the Remedial Action Plan¹ (TSCA PCB Cleanup Application or Application).

BEC's September 2, 2011 letter provided the sampling and analysis plan for the Waste Water Treatment Plant (WWTP) located at Sunkist and which will be demolished. Concrete and soil sampling activities associated with the WWTP were not addressed in the Application and BEC's September 2, 2011 letter is considered an amendment to the Application. Herein, USEPA is approving such Amendment Letter with conditions.

Below, we are responding to BEC's August 31, 2011 letter and approving with conditions BEC's September 2, 2011 Amendment Letter.

- A. BEC's August 31, 2011 Letter Responding to USEPA's Conditions of Approval
- 1. Condition C.3 (Concrete stockpiles, statistical derivation of an additional number of concrete characterization samples). As indicated in our September 2, 2011 electronic mail (e-mail) message

¹ USEPA approved with conditions the "Remedial Action Plan" (RAP) for the Former Sunkist Citrus Processing Plant in Ontario, California (Sunkist Site) dated May 22, 2011 and prepared by BEC for Sunkist Growers, Inc. The RAP serves as the polychlorinated biphenyls (PCB) risk based disposal approval application (Application) required in the Toxic Substances Control Act (TSCA) PCB regulations in 40 CFR 761.61(c). The Application is for the 11.11-acre Sunkist Site located at 616 East Sunkist Boulevard, Ontario, California.

USEPA Conditional Approval Under TSCA, 40 CFR 761.61(c) Remedial Action Plan Amendment Former Citrus Processing Plant, Ontario, California

Date: September 6, 2011

the statistical analysis of the concrete stockpile data presented in your letter satisfies the requirements in Condition 3. In addition, we agree that Stockpile D must be disposed of offsite. Please provide the name of the disposal site to where the entire contents of Stockpile D will be disposed of.

- 2. Condition C.4 (Basement 21 Removal Action [Section 4.2.1 of the RAP] and similar removal actions at other former Sunkist building basements). USEPA has reconsidered Condition C.4. In reference to sampling of soils in Basement 21, USEPA hereby modifies Condition C.4 by approving the approach proposed by Sunkist/BEC in the Application which is illustrated in Figure 10. Sunkist/BEC do not need to submit a revised Figure 10.
- 3. Condition C.5 (Stockpile Sampling and Off-Site Disposal (Section 4.2.2 of the RAP). Condition C.5 applies to existing concrete stockpiles and to stockpiles that may be generated as a result of removing from inside building basements crushed concrete that is already located inside the basements. Condition C.5 does not approve or facilitate generation of new concrete stockpiles except those stockpiles that may be generated due to the reasons explained above. If Buildings 12 and 15 have not been demolished yet, proper characterization of the concrete floors shall be conducted prior to demolition of those buildings to ensure that concrete to be crushed does not exceed the 4.5 mg/kg approved PCB cleanup level. Sunkist/BEC shall propose the sampling approach for concrete characterization before demolition of buildings and other concrete structures to be crushed.
- 4. Condition C.6 (Basement 31 Porous Material Sampling [Section 4.2.3 of the RAP]). The City of Ontario no longer wants to keep the Building 31 basement. Sunkist/BEC has proposed to remove the concrete floor from the basement in Building 31 and to crush the floor with the rest of Building 31. A Building 31 concrete stockpile would be created. Sunkist/BEC proposes not to sample the concrete floor before demolition and is requesting that USEPA modify Condition C.6. USEPA is not modifying Condition C.6. The requirements in Condition C.6 remain unchanged and shall be implemented as established in USEPA's August 19, 2011 conditional approval letter. In addition refer to Condition C.5 in Item 3 above. The TSCA regulations require in-situ sampling.
- 5. Condition C.7 (Soil beneath concrete stockpiles). No, the requirements in Condition C.7 apply to all concrete stockpiles. Therefore, soils beneath all stockpiles shall be properly characterized for PCBs and sample collection conducted as required in Condition C.7.
- 6. Cendition C.11 (Extraction and analytical methods). Regarding this issue, one field duplicate sample should be collected every ten (10) samples and not every 20 samples as indicated in the message. Please adjust the number of field duplicate samples.
- 7. Condition C.14 (Areas investigated for non-PCB contamination (Section 4.3 [Non-TSCA Related Soil Removal Activities] of the RAP). USEPA and BEC have discussed the sampling proposed at the "non-PCB" areas. USEPA concurs with the sampling proposed by Sunkist/BEC and

USEPA Conditional Approval Under TSCA, 40 CFR 761.61(c) Remedial Action Plan Amendment Former Citrus Processing Plant, Ontario, California Date: September 6, 2011

Sunkist/BEC shall conduct the sampling as described in the attached Figures 1 (Additional PCB Sampling Plan Area B-5-1), 2 (Additional PCB Sampling Plan Area D-1-1), 6 (Additional PCB Sampling Plan Area L-13), and 9 (Additional PCB Sampling Plan Area 24C).

B. BEC's September 2, 2011 Letter – Porous Media Sampling and Removal Action Plan Waste Water Treatment Plant

BEC's September 2, 2011 letter (Amendment Letter) amends the Application. USEPA is hereby approving the Amendment Letter with conditions and this approval modifies USEPA's August 19, 2011 letter.

- 1. Proposed concrete sampling at Waste Water Treatment Plant (WWTP). USEPA concurs with the revised sampling plan for concrete located in the WWTP. Concrete sampling must be conducted prior to demolition in accordance with all applicable conditions in USEPA's August 19, 2011 letter approving the Application and the attached Figure 3 (Planned Additional Sampling Wastewater Treatment Plant). USEPA and BEC discussed and agreed to the additional concrete sampling at the WWTP on September 1 and 2, 2011.
- 2. Proposed soil sampling at WWTP. USEPA is approving the proposed soil sampling beneath the concrete found to be contaminated with PCBs at the WWTP provided that one additional soil sample be collected 10 feet to the west of the soil sample location proposed outside the concrete area to be cut out and disposed of offsite as "non-TSCA" waste. The attached Figure 7 (Soil Sampling Under Impacted Concrete at WWTP) describes additional soil sampling to be conducted beneath concrete based on currently available concrete sampling results. Depending on the results of the additional concrete sampling to be conducted as required in Condition B.1 above, additional soil samples may be required.
- 3. Dust monitoring and suppression. USEPA concurs with Sunkist/BEC's calculations that dust in ambient air shall not exceed 12 micrograms per cubic meter (ug/m³) during demolition and remedial activities. Dust suppression must not generate runoff at the Site and if runoff is generated such runoff must be properly contained and the water tested for PCBs. Depending on the PCB concentration, the water may be used for unrestricted use in accordance with 40 CFR 761.79(b)(1)(iii).

The Amendment Letter refers to TSCA waste and non-TSCA waste. Under TSCA, PCB remediation waste is regulated for disposal at concentrations below 50 milligram/kilogram (mg/kg) and at concentrations equal to or above 50 mg/kg. Soils and concrete contaminated with PCBs at the site are a PCB remediation waste.

USEPA Conditional Approval Under TSCA, 40 CFR 761.61(c) Remedial Action Plan Amendment Former Citrus Processing Plant, Ontario, California Date: September 6, 2011

We look forward to being of assistance during Sunkist / BEC's implementation of the approved PCB cleanup Application as modified by USEPA's conditions of approval. Please call Carmen D. Santos at 415.972.3360 if you have any questions concerning this conditional approval.

Sincerely,

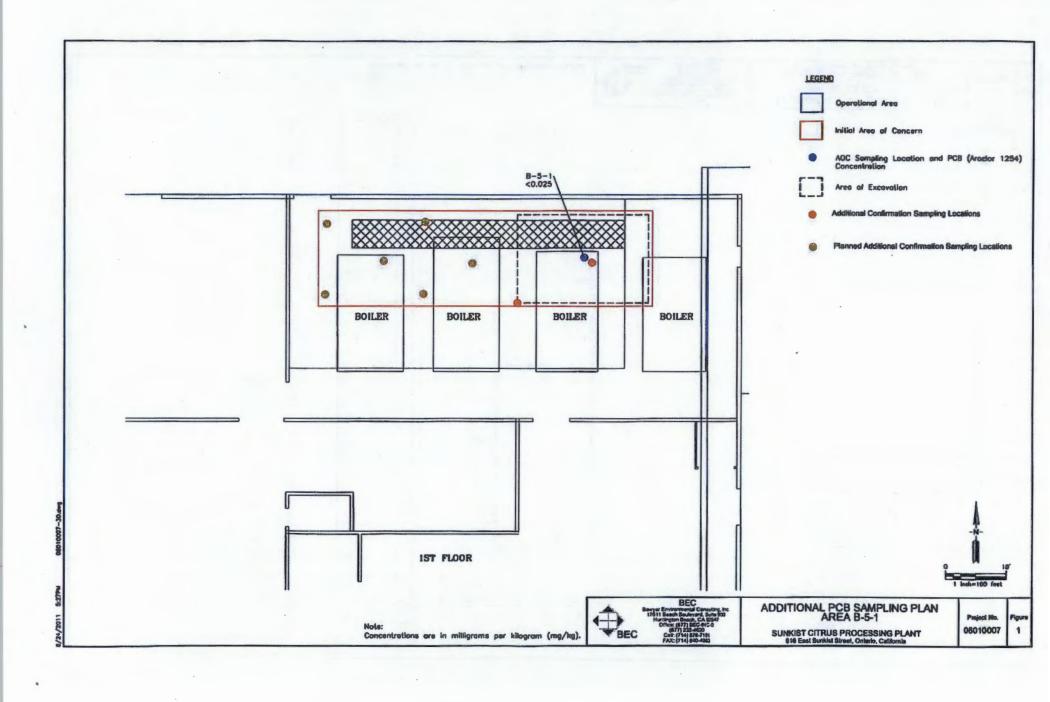
Jeff Scott, Director

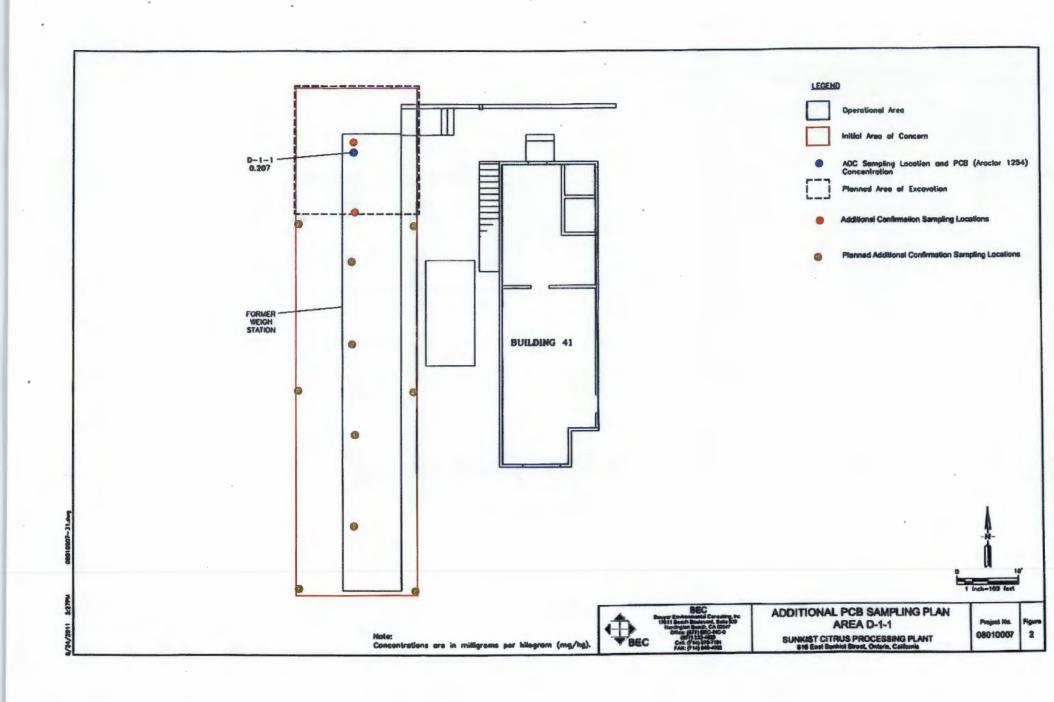
Waste Management Division

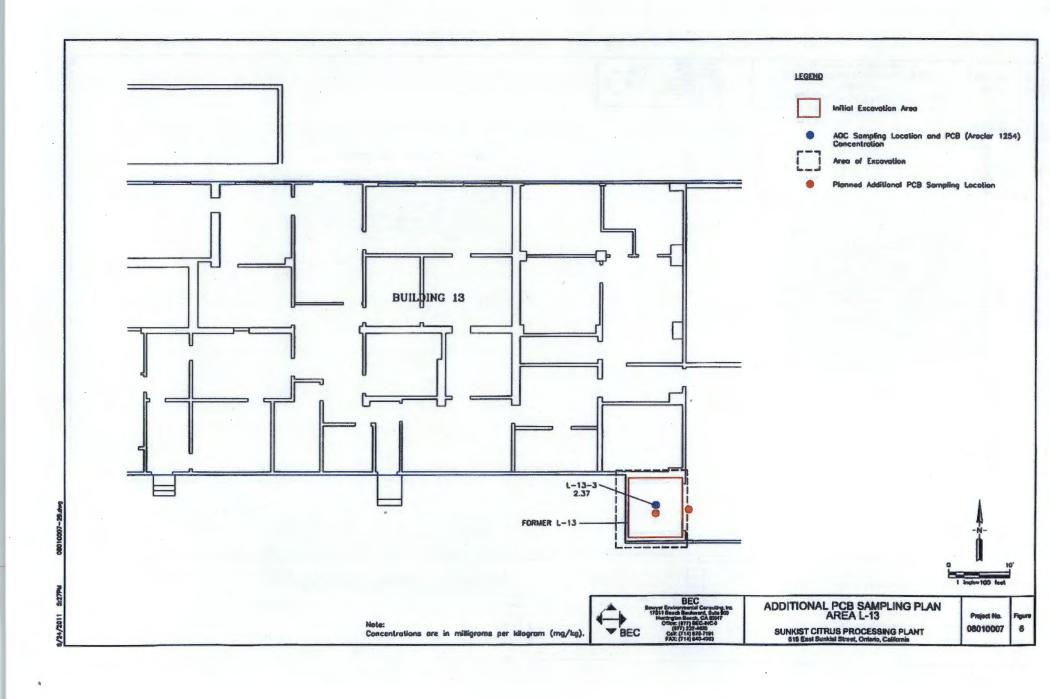
Enclosures (6)

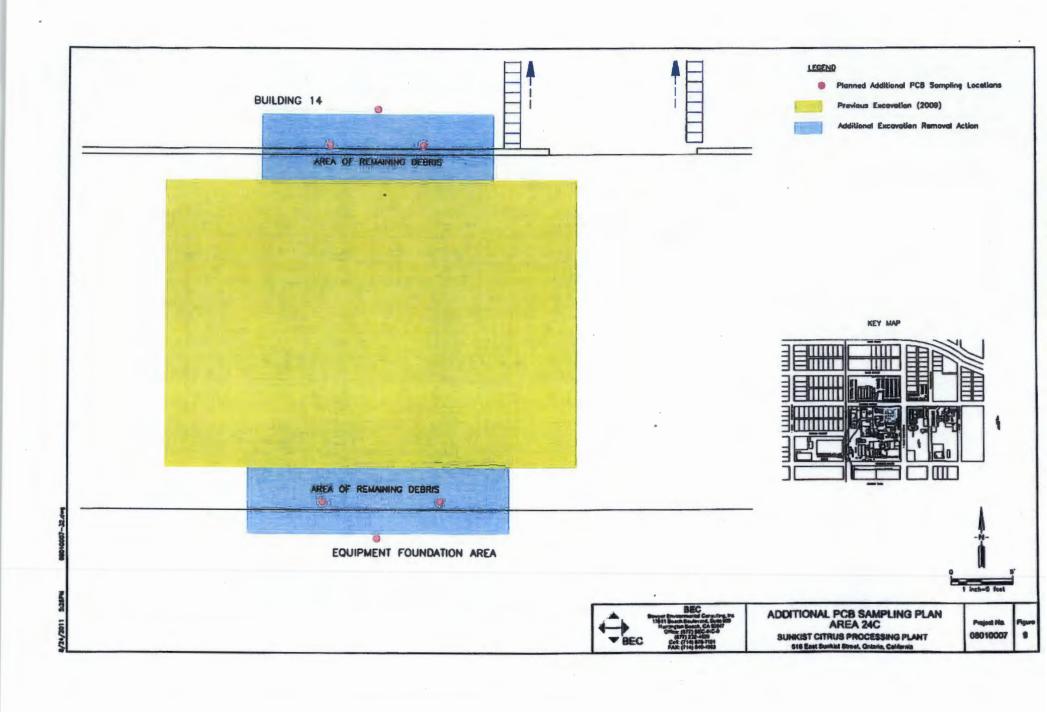
Cc: Charity Hernandez, City of Ontario

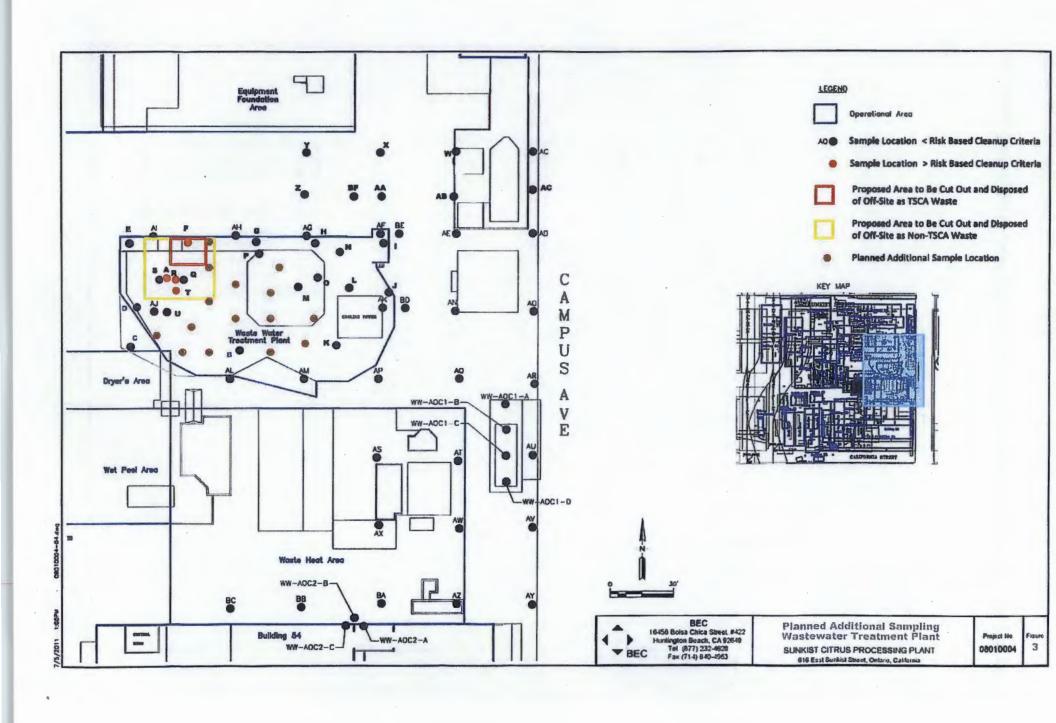
Steve Armann, USEPA R9 Carmen Santos, USEPA R9

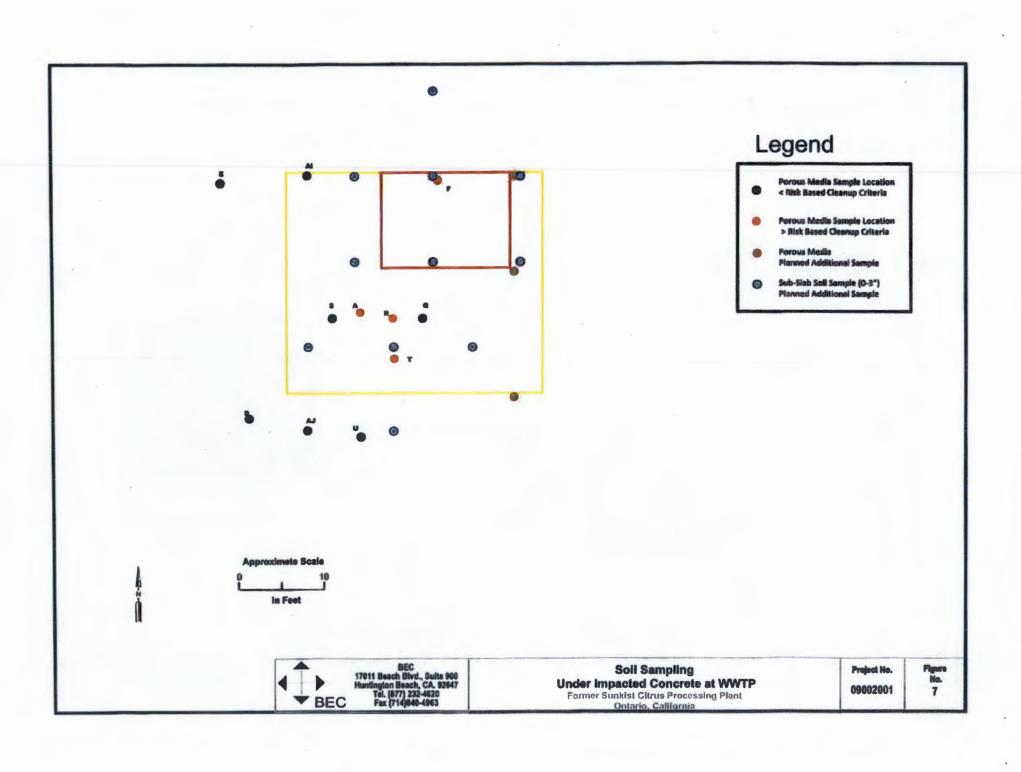














75 Hawthorne Street San Francisco, CA 94105

Via Electronic Mail and U.S. Postal Service Mail

September 6, 2011

Keith Rudd
Sunkist Growers, Inc.
Director of Environmental and Technology
531 W. Poplar Avenue
Tipton, CA 93272

Re: Polychlorinated Biphenyls (PCBs) Under Toxic Substances Control Act 40 CFR 761.61(c) – First Amendment to USEPA-Approved "Remedial Action Plan" for the Former Sunkist Citrus Processing Plant, 616 East Sunkist Boulevard, Ontario, California.

Dear Mr. Rudd:

This letter responds to your consultant's (BEC's) August 31 and September 2, 2011 letters regarding certain matters related to the PCB cleanup at the former Sunkist Citrus Processing Plant (Sunkist). BEC's August 31, 2011 letter responded to the U.S. Environmental Protection Agency Region 9's (USEPA's) August 19, 2011 letter conditionally approving the Remedial Action Plan¹ (TSCA PCB Cleanup Application or Application).

BEC's September 2, 2011 letter provided the sampling and analysis plan for the Waste Water Treatment Plant (WWTP) located at Sunkist and which will be demolished. Concrete and soil sampling activities associated with the WWTP were not addressed in the Application and BEC's September 2, 2011 letter is considered an amendment to the Application. Herein, USEPA is approving such Amendment Letter with conditions.

Below, we are responding to BEC's August 31, 2011 letter and approving with conditions BEC's September 2, 2011 Amendment Letter.

- A. BEC's August 31, 2011 Letter Responding to USEPA's Conditions of Approval
- 1. Condition C.3 (Concrete stockpiles, statistical derivation of an additional number of concrete characterization samples). As indicated in our September 2, 2011 electronic mail (e-mail) message

¹ USEPA approved with conditions the "Remedial Action Plan" (RAP) for the Former Sunkist Citrus Processing Plant in Ontario, California (Sunkist Site) dated May 22, 2011 and prepared by BEC for Sunkist Growers, Inc. The RAP serves as the polychlorinated biphenyls (PCB) risk based disposal approval application (Application) required in the Toxic Substances Control Act (TSCA) PCB regulations in 40 CFR 761.61(c). The Application is for the 11.11-acre Sunkist Site located at 616 East Sunkist Boulevard, Ontario, California.

USEPA Conditional Approval Under TSCA, 40 CFR 761.61(c) Remodial Action Plan Amendment Former Citrus Processing Plant, Outario, California Date: September 6, 2011

the statistical analysis of the concrete stockpile data presented in your letter satisfies the requirements in Condition 3. In addition, we agree that Stockpile D must be disposed of offsite. Please provide the name of the disposal site to where the entire contents of Stockpile D will be disposed of.

- 2. Condition C.4 (Basement 21 Removal Action [Section 4.2.1 of the RAP] and similar removal actions at other former Sunkist building basements). USEPA has reconsidered Condition C.4. In reference to sampling of soils in Basement 21, USEPA hereby modifies Condition C.4 by approving the approach proposed by Sunkist/BEC in the Application which is illustrated in Figure 10. Sunkist/BEC do not need to submit a revised Figure 10.
- 3. Condition C.5 (Stockpile Sampling and Off-Site Disposal (Section 4.2.2 of the RAP). Condition C.5 applies to existing concrete stockpiles and to stockpiles that may be generated as a result of removing from inside building basements crushed concrete that is already located inside the basements. Condition C.5 does not approve or facilitate generation of new concrete stockpiles except those stockpiles that may be generated due to the reasons explained above. If Buildings 12 and 15 have not been demolished yet, proper characterization of the concrete floors shall be conducted prior to demolition of those buildings to ensure that concrete to be crushed does not exceed the 4.5 mg/kg approved PCB cleanup level. Sunkist/BEC shall propose the sampling approach for concrete characterization before demolition of buildings and other concrete structures to be crushed.
- 4. Condition C.6 (Basement 31 Porous Material Sampling [Section 4.2.3 of the RAP]). The City of Ontario no longer wants to keep the Building 31 basement. Sunkist/BEC has proposed to remove the concrete floor from the basement in Building 31 and to crush the floor with the rest of Building 31. A Building 31 concrete stockpile would be created. Sunkist/BEC proposes not to sample the concrete floor before demolition and is requesting that USEPA modify Condition C.6. USEPA is not modifying Condition C.6. The requirements in Condition C.6 remain unchanged and shall be implemented as established in USEPA's August 19, 2011 conditional approval letter. In addition refer to Condition C.5 in Item 3 above. The TSCA regulations require in-situ sampling.
- 5. Condition C.7 (Soil beneath concrete stockpiles). No, the requirements in Condition C.7 apply to all concrete stockpiles. Therefore, soils beneath all stockpiles shall be properly characterized for PCBs and sample collection conducted as required in Condition C.7.
- 6. Condition C.11 (Extraction and analytical methods). Regarding this issue, one field duplicate sample should be collected every ten (10) samples and not every 20 samples as indicated in the message. Please adjust the number of field duplicate samples.
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USEPA Conditional Approval Under TSCA, 40 CFR 761.61(c) Remedial Action Plan Amendment Former Citrus Processing Plant, Ontario, California

Date: September 6, 2011

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USEPA Conditional Approval Under TSCA, 40 CFR 761.61(c) Remedial Action Plan Amendment Former Citrus Processing Plant, Ontario, California Date: September 6, 2011

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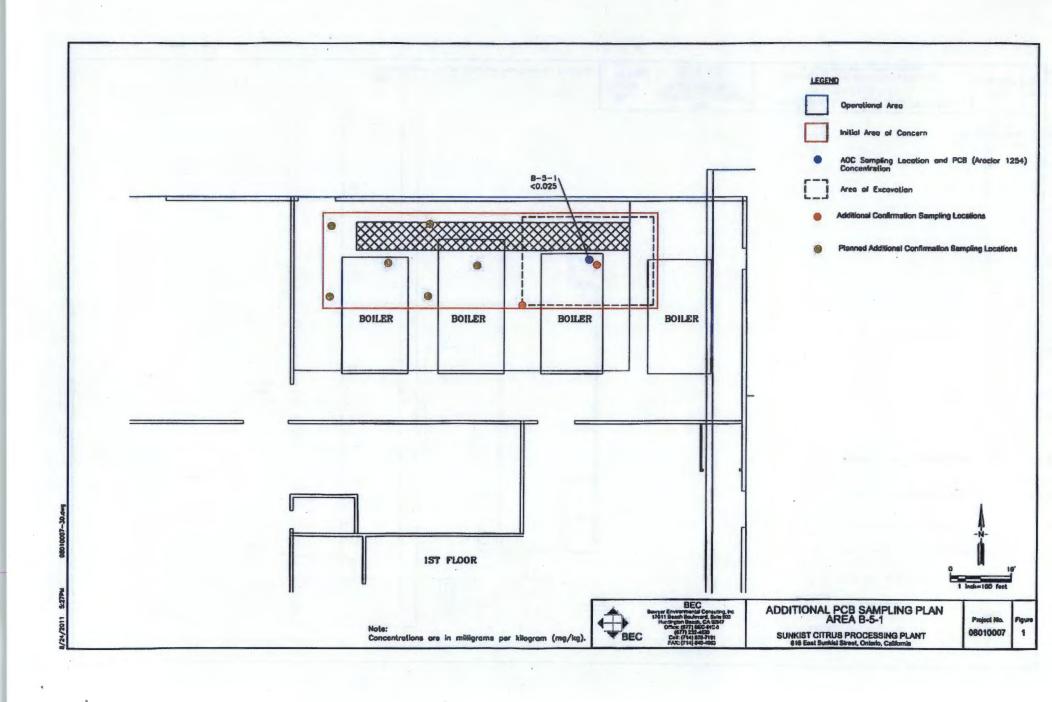
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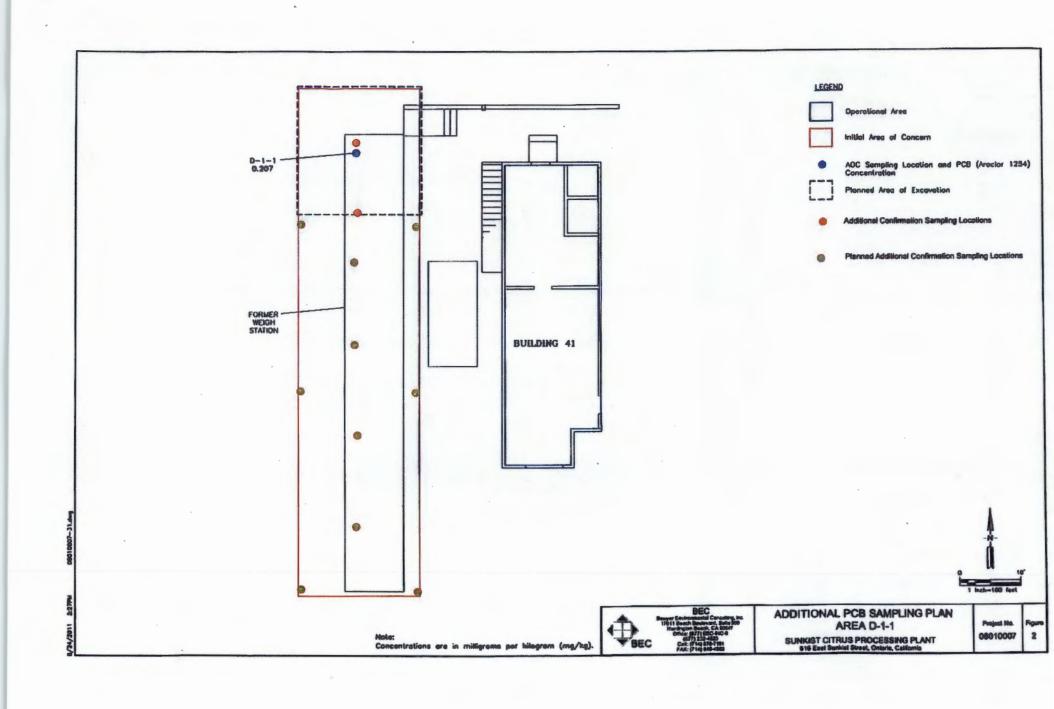
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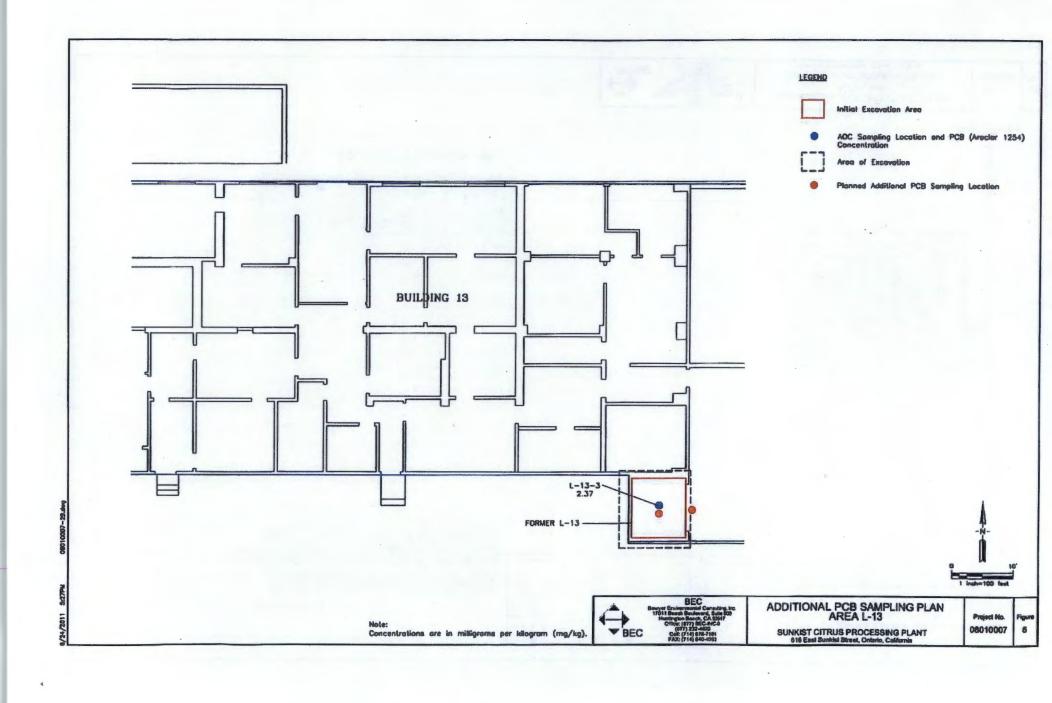
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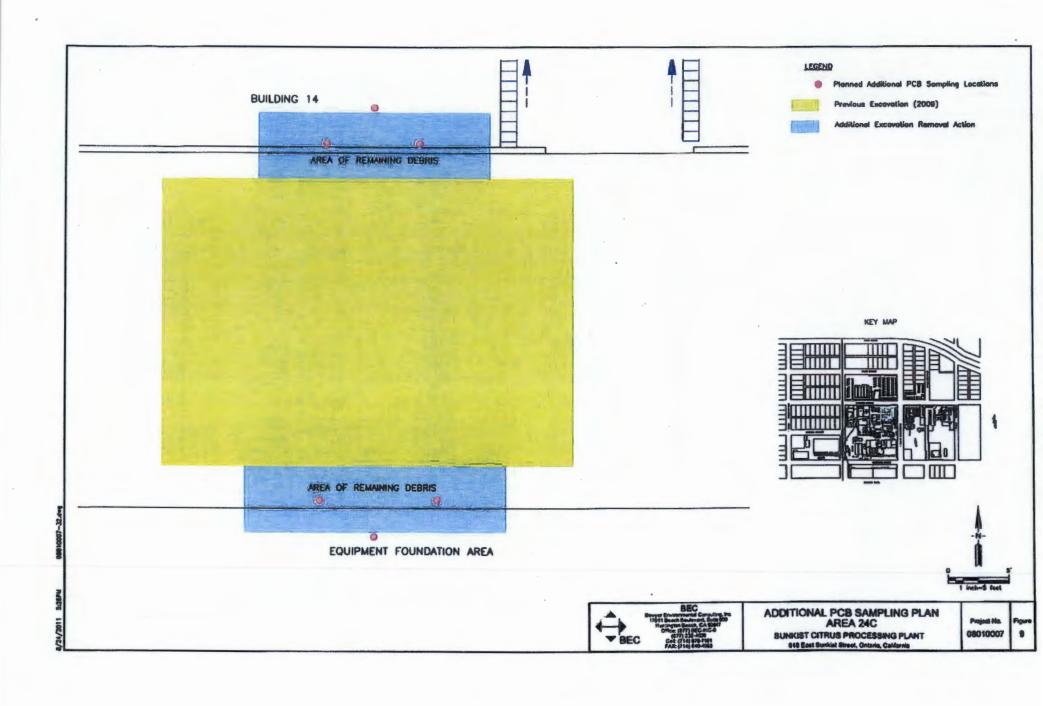
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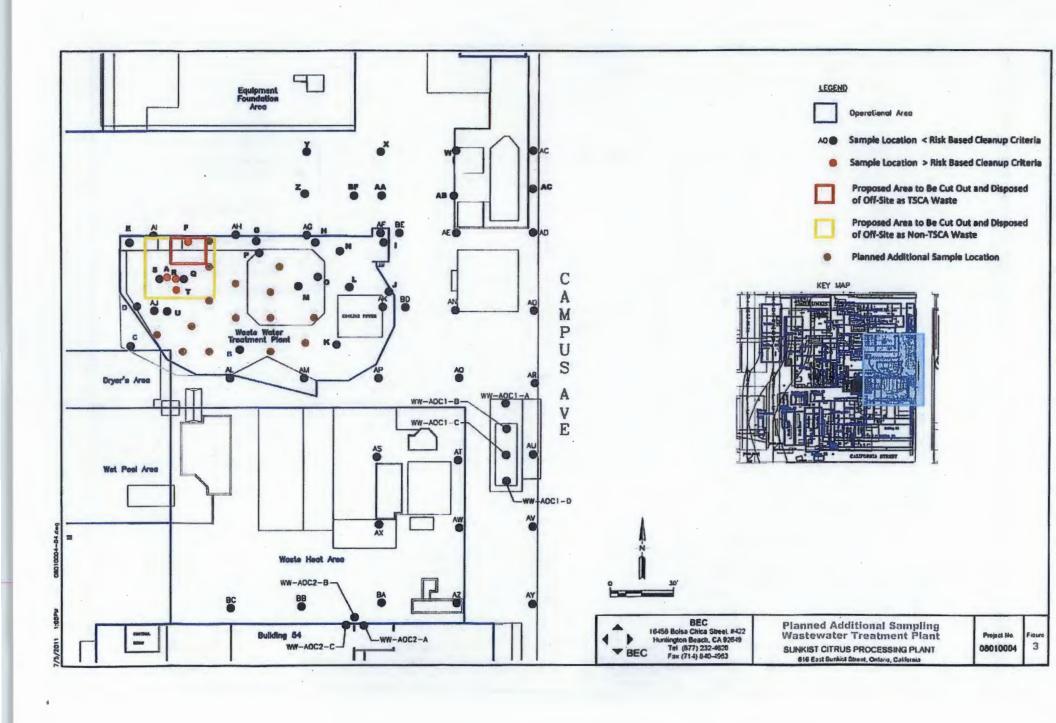
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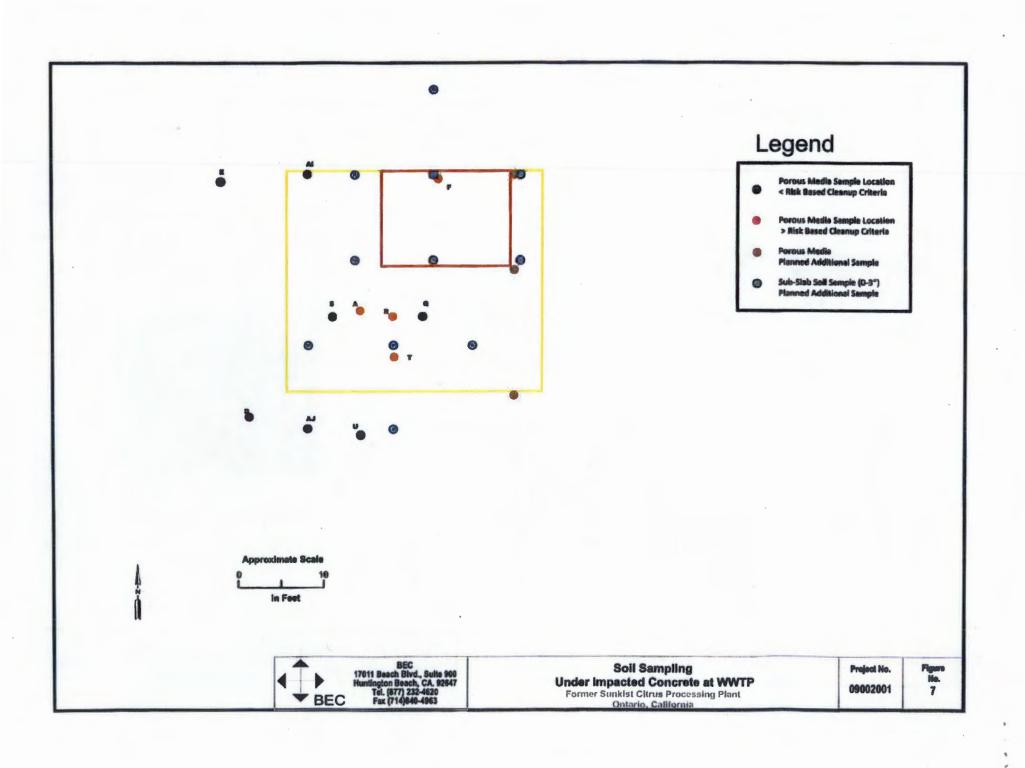














75 Hawthorne Street San Francisco, CA 94105

Via Electronic Mail and U.S. Postal Service Mail

September 6, 2011

Keith Rudd Sunkist Growers, Inc. Director of Environmental and Technology 531 W. Poplar Avenue Tipton, CA 93272

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USEPA Conditional Approval Under TSCA, 40 CFR 761.61(c) Remedial Action Plan Amendment Former Citrus Processing Plant, Ontario, California

Date: September 6, 2011

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USEPA Conditional Approval Under TSCA, 40 CFR 761.61(c) Remedial Action Plan Amendment Former Citrus Processing Plant, Ontario, California

Date: September 6, 2011

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USEPA Conditional Approval Under TSCA, 40 CFR 761.61(c) Remedial Action Plan Amendment Former Citrus Processing Plant, Ontario, California Date: September 6, 2011

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Sincerely,

Jeff Scott, Director Waste Management Division

Enclosures (6)

Cc: Charity Hernandez, City of Ontario Steve Armann, USEPA R9 Carmen Santos, USEPA R9

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U.S. EPA CONCURRENCES

OFFICIAL FILE COPY

Bowyer Environmental Consulting



August 31, 2011

VIA ELECTRONIC AND U.S. MAIL

Ms. Carmen Santos Waste Management Division U.S. Environmental Protection Agency Region 9 75 Hawthorne Street San Francisco, CA 94105

Subject:

Response to Conditional Requirements

Polychlorinated Biphenyls, Toxic Substances Control Act (40 CFR 761.61(c)) – USEPA Conditional Approval of "Remedial Action Plan"

Former Sunkist Citrus Processing Plant

616 E. Sunkist Street Ontario, California

Dear Ms. Santos:

Bowyer Environmental Consulting, Inc. (BEC) has prepared this response to the United States Environmental Protection Agency (EPA) conditional approval of the polychlorinated biphenyls (PCBs), Toxic Substances Control Act (40 CFR 761.61(c)) – "Remedial Action Plan" (Conditional Approval), which was provided by the EPA on August 19, 2011. The Conditional Approval was provided in response to the Remedial Action Plan (RAP) that BEC submitted to the EPA on, May 22, 2011, and additional information (Risk Assessment/RAP Review and Additional Action Items) that BEC provided to the EPA on July 22, 2011. The facility which is the subject of the RAP and Conditional Approval is the former Sunkist Citrus Processing Plant (Sunkist Site), located at 616 E. Sunkist Street in Ontario, California.

In order to facilitate the review of the additional information provided in this response, the specific conditions provided in the EPA conditional approval are listed, along with the associated responses, as follows.

1. Sunkist PCB Cleanup Site. The Sunkist PCB Cleanup Site (PCS) is located within the 11.11-acre Sunkist Site and encompasses all the areas of the Sunkist Site investigated for PCBs including and not limited to the former location of certain buildings already demolished and their associated basements as well as the location of buildings and related basements still to be demolished. The PCS also encompasses the areas where stockpiles of concrete derived from the demolition of Site buildings are located. Concrete in these stockpiles contain PCBs at various concentrations.

Agreed and noted.

2. **PCB cleanup level for soils and concrete.** The approved PCB cleanup level for soils and concrete is 4.5 milligrams/kilogram (mg/kg). The PCB cleanup level discussed in the RAP (Application) is 6.5 mg/kg PCBs and this approval modifies the cleanup level in the RAP to 4.5 mg/kg. This approval is based on the health risk assessment conducted for the Sunkist Site as revised based on USEPA's comments on the risk assessment and guidance. The approved PCB cleanup is protective of the offsite residential, industrial, and construction worker exposure scenarios evaluated for receptors in proximity to the Site. The approved PCB cleanup level was developed taking into consideration analytical results for PCB Aroclor and dioxin-like PCB congeners.

Agreed and noted.

3. Concrete stockpiles, statistical derivation of an additional number of concrete characterization samples. Within 5 days after the date of this approval, Sunkist/BEC must submit for USEPA approval the revised

¹ The attached electronic mail message from Dr. Patrick Wilson (USEPA R9) to Carmen Santos (USEPA R9), <u>Subject:</u> Former Sunkist Citrus Processing Plant Risk Assessment Review & PCB Remediation Goals briefly summarizes USEPA's risk assessment review. Also, refer to BEC's memo from Dr. Heriberto Robles to Brett Bowyer (BEC), <u>Subject:</u> Derivation of Risk-Based Cleanup Levels for PCBs in Crushed Concrete Addendum dated July 22, 2011 and included in BEC's July 22, 2011 letter to USEPA.

proposed number of additional concrete samples to be collected from each of several stockpiles (about 21) and building basements at the PCS. These stockpiles are listed in the attached table which is an excerpt from BEC's July 22, 2011 letter (Subject: Risk Assessment / RAP Review and Additional Action Items Former Sunkist Citrus Processing Plant...). Properly applied SW-846 statistical methodology shall be employed to calculate the number of additional concrete samples. The approved cleanup level of 4.5 mg/kg PCBs shall be used as the regulatory threshold (RT) instead of the 1 mg/kg RT used in the calculations presented in BEC's July 22, 2011 letter. Based on the above, USEPA is requiring that Sunkist/BEC conduct the following steps:

- a. Sunkist/BEC must use the existing data and the current version of ProUCL to separately calculate the distribution-specific 95% upper confidence limit (UCL) on the mean concentration for each stockpile. Stockpiles with UCLs above 4.5 mg/kg PCBs shall be disposed offsite to prevent any exposures to PCBs contained in the concrete from these stockpiles in the future.
- b. For the stockpiles not identified for disposal in Condition C.3.a ("the remaining stockpiles"), the existing concrete stockpile data may be insufficient as to justify onsite use of the remaining concrete. Sunkist/BEC must conduct additional sampling of those stockpiles. The existing data for the remaining stockpiles shall be used to derive the number of additional concrete characterization samples needed for each of the remaining stockpiles using the statistical method specified in SW-846 and a regulatory threshold of 4.5 mg/kg and not of 1 mg/kg. A random sampling approach shall be used to collect the additional concrete samples needed from each remaining stockpile.
- c. Sunkist/BEC shall use the existing PCB characterization data for the remaining stockpiles together with the new data (required in Condition C.3.b) and the current version of ProUCL to calculate a separate UCL for each remaining stockpile. Sunkist/BEC must dispose offsite any

stockpiles with a UCL above the 4.5 mg/kg PCB cleanup level (regulatory threshold).

Sunkist/BEC proposed in Section 3.1 (PCB Removals) of the RAP to remove for offsite disposal the crushed concrete in Basement 21, and in stockpiles W-N, D, 10, 16, 17, and 18 (including 18a and 18b). USEPA approves the offsite disposal of the concrete in Basement 21 and in the mentioned stockpiles in context to the approved PCB cleanup level of 4.5 mg/kg.

Please note that, per the specified response schedule (" within 5 days after the date of the approval"), this response was provided previously via an email from Brett Bowyer of BEC to Carmen Santos and Steve Armann of the USEPA on August 25, 2011. Sunkist/BEC is in agreement with this comment and is providing the additional information and plans as part of this response. Please note that following the additional sampling of the crushed concrete stockpiles per the previously submitted plan (BEC, July 22, 2011), Sunkist made a decision to remove select stockpiles from the Site that we believed would not meet the revised cleanup criteria. The removed crushed concrete stockpiles included, Stockpiles 10, 14, 15, 16, 17 and W-N. In addition, the crushed concrete in Basement 21 is in the process of being removed from the Site. All of this material is being properly disposed of off-Site. Documentation regarding the disposed volumes and disposal facility information will be provided in the Completion Report. The approximate former location of these stockpiles, and of the remaining stockpiles and filled basements are shown on the attached Figure 1.

As per the requirements specified above, BEC performed additional statistical evaluations for the remaining twelve stockpiles of crushed concrete (Stockpiles 11, 12, 13, 18, 19, 20, 21, A, B, C, D and W-S) and two filled basements (Basement 11 and 64). This evaluation was performed per the methods specified in SW-846 (utilizing the 4.5 mg/kg cleanup value as the regulatory threshold, and the specific data previously

collected from each stockpile and/or basement) to determine the appropriate number of additional samples necessary to complete the characterization of each of the stockpiles and/or basements. The evaluation is provided in Attachment A. As shown, the re-evaluation of the stockpiles specific data utilizing 4.5 mg/kg as the regulatory threshold found that sufficient data was available to characterize each of the stockpiles/basements except for Stockpile D. The SW-846 evaluation determined that thousands of samples would need to be collected from Stockpiles D in order to complete the characterization. In addition, based on the current dataset, the ProUCL calculation for Stockpile D is 6.35 mg/kg. Given these conditions, it has been decided that Stockpile D will be disposed of off-Site. Documentation regarding the final deposition of Stockpile D will be provided in the Completion Report.

An evaluation of the UCL for Stockpiles 11, 12, 13, 18, 19, 20, 21, A, B, C, and W-S, and for Basement 11 and 64 has been conducted, as provided in Attachment A. As shown the ProUCL estimate for each of these stockpiles and basements is less than the approved 4.5 mg/kg cleanup value. Based on the additional evaluations conducted here, Stockpiles 11, 12, 13, 18, 19, 20, 21, A, B, C and W-S will be utilized to fill low spots and as road base on the Site.

- 4. Basement 21 Removal Action (Section 4.2.1 of the RAP) and similar removal actions at other former Sunkist building basements. USEPA approves of the proposed remedial action as modified by this condition below and Condition C.3 above. USEPA is approving under 40 CFR 761.61 (a) the soil sampling to be conducted in Basement 21 and any other basement from which crushed concrete will be removed.
 - a) Crushed concrete containing PCBs above the cleanup level has been placed in the basement of former Building 21. After the crushed concrete is removed from the basement, Sunkist/BEC proposes to collect composite soil samples following the procedures in 40 CFR

761.289(b)(1)(i). However, those sampling procedures do not apply. Instead, Sunkist/BEC shall collect the composite soil samples following the sampling approach in 40 CFR 761.289(b)(1)(ii), (b)(1)(ii)(A), (b)(1)(ii)(B), and (b)(1)(ii)(C) or equivalent method. Within 10 days after the date of this approval, Sunkist/BEC shall resubmit Figure 10 depicting the soil sampling locations in the Building 21 basement and such locations shall be determined based on the sampling method in this regulation.

As per our discussion on August 24, 2011, it was agreed that despite the fact that the presence of the crushed concrete in Basement 21 met the regulatory description provided in 40 CFR 761.289(b)(1)(ii), (b)(1)(ii)(A), (b)(1)(ii)(B), and (b)(1)(ii)(C), the data generated by collecting composite soil samples following the procedures in 40 CFR 761.289(b)(1)(i) would be more practical in this case. As a result, it is our understanding that the approach presented in the RAP is to be approved, and there is no need to provide a revised version of Figure 10.

5. Stockpile Sampling and Off-Site Disposal (Section 4.2.2 of the RAP).

Sampling of concrete from building basements and in above ground stockpiles must be conducted consistent with the method established in Condition C.3 above.

Agreed and Noted. The stockpiles generated through the demolition of Buildings 12 and 15 will be crushed and sampled on a random basis. The appropriate number of samples will be defined based on SW-846 methodology and the UCL will be determined based on the data set. The UCL will be compared to the cleanup value (4.5 mg/kg). If the UCL is less than the 4.5 mg/kg than it will be utilized on-Site as fill and/or road base. If the UCL is greater than 4.5 mg/kg it will be properly disposed of off-Site.

6. Basement 31 Porous Material Sampling (Section 4.2.3 of the RAP). USEPA approves of the sampling approach proposed for the concrete floor in Basement 31 provided the basement is not filled with bulk concrete (crushed or uncrushed). Soil samples shall be collected at concrete sampling locations where PCBs are equal to or higher than 4.5 mg/kg PCBs. One additional soil sample shall be collected in the lift L-42 area for a minimum of three soil samples to be collected from that area for PCB analysis. In addition, if the Basement 31 is filled with bulk concrete, the floor of this basement shall be sampled following the requirement in Condition C.4 above.

The additional sample will be collected at L-42. However, as the City (property buyer) does not want this concrete feature to remain at the current depth, the basement floor at Building 31 will be removed during demolition. As it is no longer planned to leave the basement in place, the sampling approach proposed in the RAP is no longer applicable. It is now planned that this concrete will be removed and crushed along with the rest of Building 31. The stockpiles generated through the demolition of Buildings 31 (including the basement) will be crushed and sampled on a random basis. The appropriate number of samples will be defined based on SW-846 methodology and the UCL will be determined based on the data set. The UCL will be compared to the cleanup value (4.5 mg/kg). If the UCL is less than the 4.5 mg/kg than it will be utilized on-Site as fill and/or road base. If the UCL is greater than 4.5 mg/kg it will be properly disposed of off-Site. It should be noted that the only material that will be utilized for fill and/or road base will be analyzed by the above-described approved methods involving the comparison of the UCL to the cleanup criteria. Material that does not exhibit an UCL of less than 4.5 mg/kg will not be utilized (at Basement 31 or anywhere else on the Site) as fill, or for any other purpose. As a result, only Basement 21, or soil under former stockpiles that exhibited PCB concentrations of greater than 4.5 mg/kg (See Comment No. 7), will need to be sampled to confirm that the unacceptable material has been removed. As such, no additional sampling of the subsurface after the removal of the concrete floor from Basement 31 is necessary (other than at the lifts).

Any additional concrete at the Site generated during the additional demolition will be evaluated by the approved procedures to determine if it can be reused as fill and/or road base, or needs to be disposed off-Site (UCL of greater than 4.5 mg/kg). For instance, the foundation of the Wastewater Treatment Plant (WWTP) has been sampled as presented in the Porous Media Sampling and Removal Action Plan - Wastewater Treatment Plant (BEC, August 29, 2011). As described in this document, areas that exhibited PCB concentrations of greater than 4.5 mg/kg are to be cut out and properly disposed of off-Site. The remaining foundation material will be crushed, and an appropriate number of random samples (per SW-846) will be collected and statistically evaluated to determine the UCL. If the UCL for this material is less than the cleanup criteria (4.5 mg/kg) than the material will be reused at the Site a fill and/or road base. If the material has an UCL of greater than 4.5 mg/kg it will be properly disposed of off-Site.

7. Soil beneath concrete stockpiles. Sunkist/BEC must sample surface soils (0 to 3 inches below ground surface) beneath all the concrete stockpiles to verify that PCBs are not present above the approved PCB cleanup level. Within 10 days after the date of this approval, Sunkist/BEC shall submit for review and approval the sampling approach to make this verification.

Agreed and Noted. This requirement applies to stockpiles that contained PCB concentrations of greater than 4.5 mg/kg. As such, soil samples will be collected at 0-3 inches below ground surface under and near Stockpiles W-N, W-S, A, C, D, 10, 13, 14, 15, 16, 17 and 18. Samples will not be collected from Stockpiles B, 11, 12, 19, 20 and 21 as discrete samples of greater than 4.5 mg/kg were not observed in these stockpiles. The sampling areas with respect to the Stockpiles, and Site in general, are shown on Figure 1. Specific plans for the sample collection are shown on Figures 2 through 4. As shown, the total area associated with this sampling program is over 1.2 acres in size. As such, the compositing areas have been modified to include up to 36 discrete samples per area for the larger areas. In total, the planned program involves the analysis of 43 composited samples. Each of these samples will be analyzed for PCBs by the methods specified in Comment No. 11.

8. **Decontamination of Movable Equipment, Tools, and Sampling Equipment Contaminated by PCBs.** Equipment not covered in the USEPA
Region I SOP must be decontaminated following the requirements in 40 CFR
761.79(c)(2).

Agreed and Noted.

9. Off-site disposal of decontamination residues, PCB remediation waste, and cleanup wastes. Decontamination residues and cleanup wastes must be disposed based on their original PCB concentration in accordance with 40 CFR 761.79(g)(2), (g)(6), and 40 CFR 761.61(a)(5), (a)(5)(i), (a)(5)(iii), and (a)(5)(v). Concrete and/or other porous surfaces(s) contaminated with PCBs above the PCB cleanup level to be approved must be disposed of as bulk PCB remediation waste in accordance with the requirements in 40 CFR 761.61(a)(5)(i)(B)(2)(ii), (a)(5)(v)(A), and (a)(5)(i)(B)(2)(iii). Disposal of all wastes (e.g., personal protective equipment, soils, concrete) generated during cleanup of PCBs must be in compliance with all applicable federal, state, and local regulations.

Agreed and Noted.

10. Dust management plan. Within 10 days after the date of this approval, BEC must submit a dust management plan that includes ambient air sampling and it is designed to be protective of workers and the public when conducting any activity at the Site that generates dust such as during crushing of PCB-contaminated concrete, demolition of above ground structures, and demolition of any remaining below ground structures at the Site. The dust management plan shall also be implemented during movement and removal of concrete from the concrete stockpiles and during movement of soils. As part of the dust management plan Sunkist/BEC shall propose a concentration (in mg/m3) of dust that is protective of all receptors. Workers must be adequately protected to prevent exposure to PCBs.

A previous plan associated with the management of dust at the Site was sent to you via email on June 27, 2011. This plan has been augmented to

include a target level and confirmation monitoring based on all exposure pathways. A copy of this plan is provided in Attachment B.

11. Extraction and analytical methods. Field and laboratory quality control samples. Under the TSCA PCB regulations the applicant has the option to choose either the Soxhlet extraction method (USEPA Method 3540C) or the Ultrasonic method (USEPA Method 3550C). The Soxhlet extraction method is preferred by USEPA or both concrete and soil samples. If necessary, post extraction and pre-analysis sample cleanup (e.g., USEPA Methods 3665A [sulfuric acid], 3620C [florisil column], 3640A [Gel Permeation Column, GPC]) procedures must be considered if matrix interferences are suspected that could increase analytical method detection limits and compromise comparisons of analytical results to the cleanup levels required in this approval.

Within five (5) days after the date of this approval and before starting sampling at the PCS Sunkist/BEC shall submit a description of quality control (QC) procedures that will be implemented in the field during sample collection (characterization and cleanup verification sampling) and number and type of field QC (e.g., duplicates) samples to be collected for soil and concrete. This description shall also identify the laboratory QC samples (i.e., surrogate spikes, matrix spikes, equipment blanks) that will be prepared and analyzed by the contracted analytical laboratory together with the site samples.

Please note that, per the specified response schedule ("within 5 days after the date of the approval"), this response was provided previously via an email from Brett Bowyer of BEC to Carmen Santos and Steve Armann of the USEPA on August 25, 2011. Agreed and Noted. As specified in the Sampling and Analysis Plan (SAP) that was submitted (Appendix D) as part of the RAP (BEC, May 22, 2011) the following QA/QC samples will be collected:

 Field Duplicates - Field duplicate samples will be collected at a minimum frequency of 1 for every 20 samples collected. Duplicate samples will be independently collected as close as possible to the

> original sample from the same source under identical sampling conditions. The field duplicate samples will be uses to document sampling and analytical precision.

- Equipment Rinsate Blanks Equipment rinseate blanks will be collected to evaluate field sampling and decontamination procedures by pouring water (for soil and stockpile sampling) or hexane (for porous material sampling) over the decontaminated equipment, following sample collection. In general, equipment blanks will be collected at a rate of 1 in 20 (minimum of one per day).
- Matrix Spike and Matrix Spike Duplicate (MS/MSD) In general, for every 20 field samples, one location will have sample volume collected in triplicate and will be designated on the chain-ofcustody form as an MS/MSD.
- Surrogate Analysis ABC will analyze surrogates with each of the analyses performed. For the 8082 analysis, the laboratory utilizes 2,4,5,6-tetrachloro-m-xylene and decachlorobihenyl as surrogates. The recoveries of these compounds will be reported on the laboratory reports.
- **12. Notification of PCB activity.** Sunkist/BEC must comply with the notification and manifest requirements of 40 CFR 761, Subpart K when storing onsite, transporting, and disposing of PCBs offsite. Sunkist/BEC must comply with the requirements in 40 CFR 761.65(c)(1) and Sunkist/BEC's storage of PCB waste must not trigger the more stringent requirements in 40 CFR 761.65(b) and 761.65(c)(7) to be exempted from filing the Notification of PCB Activity as a generator of PCB waste.

The transporter of PCB remediation waste from the Sunkist Site must submit to USEPA Headquarters a Notification of PCB Activity Form before transporting the waste to the offsite disposal facility. Sunkist/BEC must dispose offsite all concrete that contains PCBs above the approved cleanup level without further delay. In accordance with 40 CFR 761.61(c), USEPA is extending the storage of PCB remediation waste at the site up to an additional 90 days beyond the 180 days

established in 40 CFR 761.65(c)(9). Storage of waste containing PCBs above the cleanup level has already exceeded the 180 days established in 40 CFR 761.65(c)(9).

Per previous direction from the EPA, a PCB Activity Notification was previously sent to EPA Headquarters. A copy of the previous notification and proof of delivery on August 2, 2011 is provided as Attachment C. We are assuming that the attached notification fulfills the requirement stated in the conditions. Please confirm and/or let us know if you require additional specific notifications to be made by the transporter. Also, we understand that all PCB material above the cleanup criteria (4.5 mg/kg) needs to be disposed of off Site prior to February 19, 2012.

13. Demonstration of compliance with concrete and soil cleanup level. Sunkist / BEC will calculate the distribution-specific 95% confidence limit of the mean (i.e., the exposure-point concentration) of the analysis results for bulk concrete characterization samples, soil characterization samples, and soil cleanup verification samples separately using USEPA's ProUCL statistical program and compare that exposure point concentration (EPC) for soils and concrete to the cleanup level.

For concrete in stockpiles and / or placed in former building basements, Sunkist/BEC must refer to Condition C.3 above.

If the EPC for soils is higher than the cleanup level, Sunkist/BEC must conduct additional cleanup of soils and collect cleanup verification samples until the EPC calculated via ProUCL using this additional data is below the cleanup level. If the cleanup level is not achieved after further soil cleanup, Sunkist/BEC shall confer with USEPA as to the next steps that it will take to resolve the matter.

Please note that, per the specified response schedule (" within 5 days after the date of the approval"), this response was provided previously via an email from Brett Bowyer of BEC to Carmen Santos and Steve Armann of the USEPA on August 25, 2011. Agreed and Noted. As stated in the response to No. 3, the EPC's for crushed concrete in stockpiles and

basements that are less than the cleanup level (4.5 mg/kg) are provided in Attachment A. Additional evaluations will be made upon the collection of representative soil and/or crushed concrete samples as discussed in preceding sections of this letter. The results of these additional analyses and the calculation of EPCs will be provided in the Completion Report.

14. Areas investigated for non-PCB contamination (Section 4.3 [Non-TSCA Related Soil Removal Activities] of the RAP). Sunkist/BEC have indicated the source of PCBs at the Sunkist Site is unknown. Investigations for non-PCB contaminants have occurred in Area 24C, Area D-5-1, Area L-13-3, Area B-5-1, and Area D-1-1 (collectively referred to as "Non-PCB Areas") and petroleum hydrocarbons and polyaromatic hydrocarbons (PAHs) are present at some of these areas. Given Sunkist's uncertainty on the source of PCBs and the presence of PAHs and petroleum hydrocarbons, USEPA is requesting that cleanup verification sampling to be conducted in the "Non-PCB Areas" include testing for PCBs. Within 15 days after the date of this letter propose the number of soil samples that Sunkist/BEC will collect to demonstrate PCBs are not present in the "Non-PCB Areas" in concentrations above the USEPA-approved PCB cleanup level.

Please note that, this response was provided previously via an email from Brett Bowyer of BEC to Carmen Santos and Steve Armann of the USEPA on August 25, 2011. The non-PCB areas were relatively small and all but one of these areas (24C) had one or two previous samples collected and analyzed for PCBs. The results of the previous analyses, along with plans for additional sample collection and analysis are provided on the attached Figures 5 through 9. Please concur or provide comment on these proposed plans as soon as possible, as the proposed sampling has already been implemented in order to meet the critical project schedule.

15. **PCB Cleanup Completion Report.** Within 60 days after Sunkist/BEC demonstrate that residual PCBs in soils are equal to or below the USEPA-approved PCB cleanup level, Sunkist/BEC must submit a PCB Cleanup

Completion Report for USEPA approval (under 40 CFR 761.61(c)). This report must demonstrate compliance with all the conditions of approval and applicable TSCA PCB regulations in addition to applicable state and local regulations. Sunkist/BEC shall refer to 40 CFR 761.61 (a)(9) and 761.125(c)(5) as a guideline to prepare the report and such guideline represents minimum requirements for the required PCB Cleanup Report. This report must provide all relevant sampling and analysis data and justifications demonstrating that Sunkist/BEC achieved the USEPA approved PCB cleanup level and that it met the conditions of approval.

Agreed and Noted.

16. **Deed Restriction.** Within 20 days after the date of this letter, confer with USEPA concerning the deed restriction that will be recorded for the property and in context to the PCB cleanup.

Agreed and Noted.

As we have relayed previously, there is a need to meet critical schedule conditions associated with this project. As such, we would appreciate your concurrence to these responses as soon as possible. If there is a need to confer regarding these responses, please contact us at 877-232-4620 at your earliest possible convenience.

Sincerely,

Heriberto Robles, Ph.D., D.A.B.T.

Senior Technical Consultant

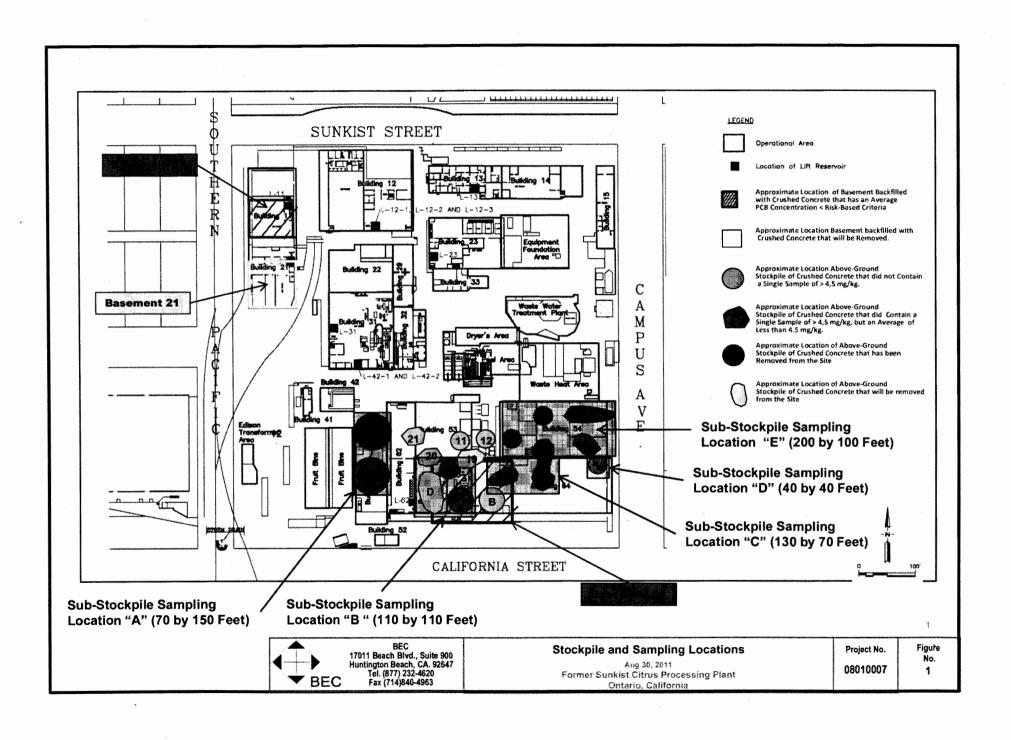
Bowyer Environmental Consulting, Inc.

Brett H. Bowyer, P.G.

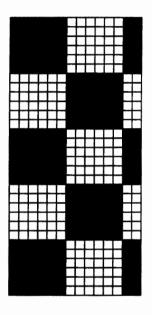
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Bowyer Environmental Consulting, Inc.

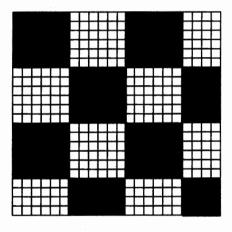
Figures



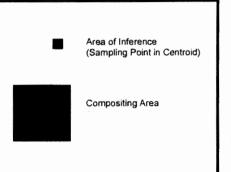
Sampling Area A



Sampling Area B



Legend



Approximate Scale

0 50 In Feet





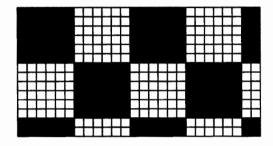
Sub-Stockpile Sampling Locations A and B

Aug 30, 2011 Former Sunkist Citrus Processing Plant Ontario, California Project No.

08010007

Figure No. 2

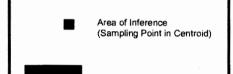
Sampling Area C



Sampling Area D



Legend



Compositing Area

Approximate Scale





Sub-Stockpile Sampling Locations C and D

Aug 36, 2011
Former Sunkist Citrus Processing Plant
Ontario, California

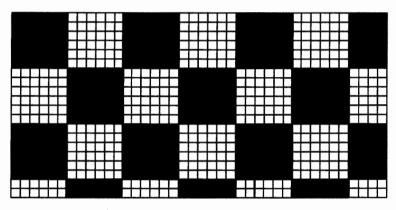
Project No.

Figure No. 3

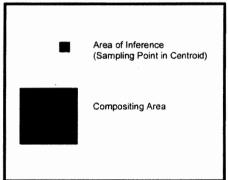
08010007

BEC 17011 Beach Blvd., Suite 900 Huntington Beach, CA. 92647 Tel. (877) 232-4620 Fax (714)840-4963

Sampling Area E







Approximate Scale

In Feet





BEC 17011 Beach Blvd., Suite 900 Huntington Beach, CA. 92647 Tel. (877) 232-4620 Fax (714)840-4963

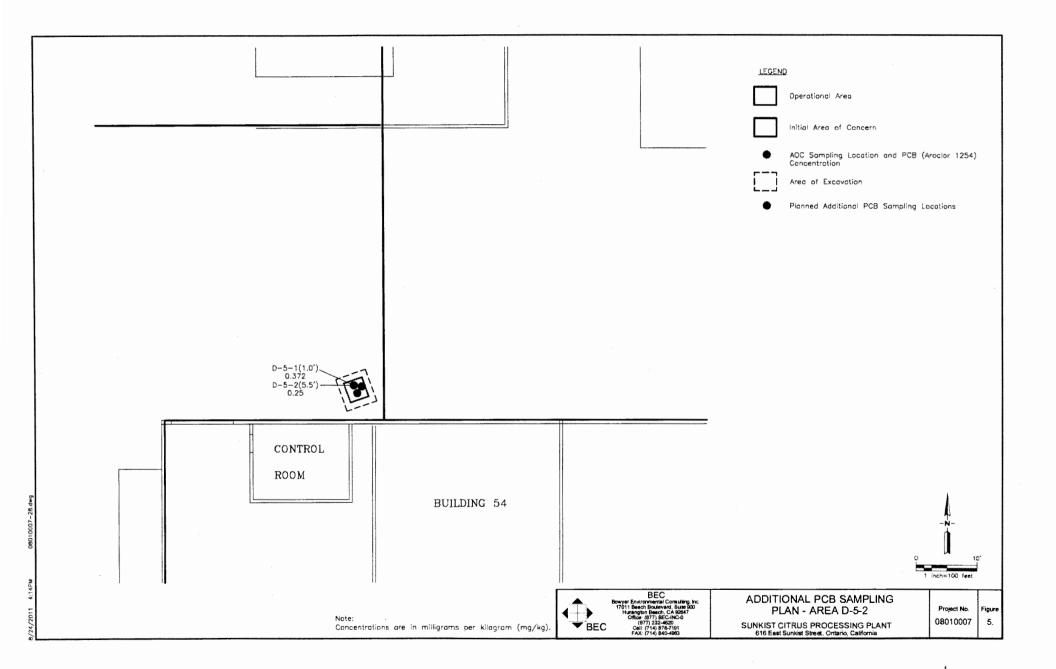
Sub-Stockpile Sampling Location E

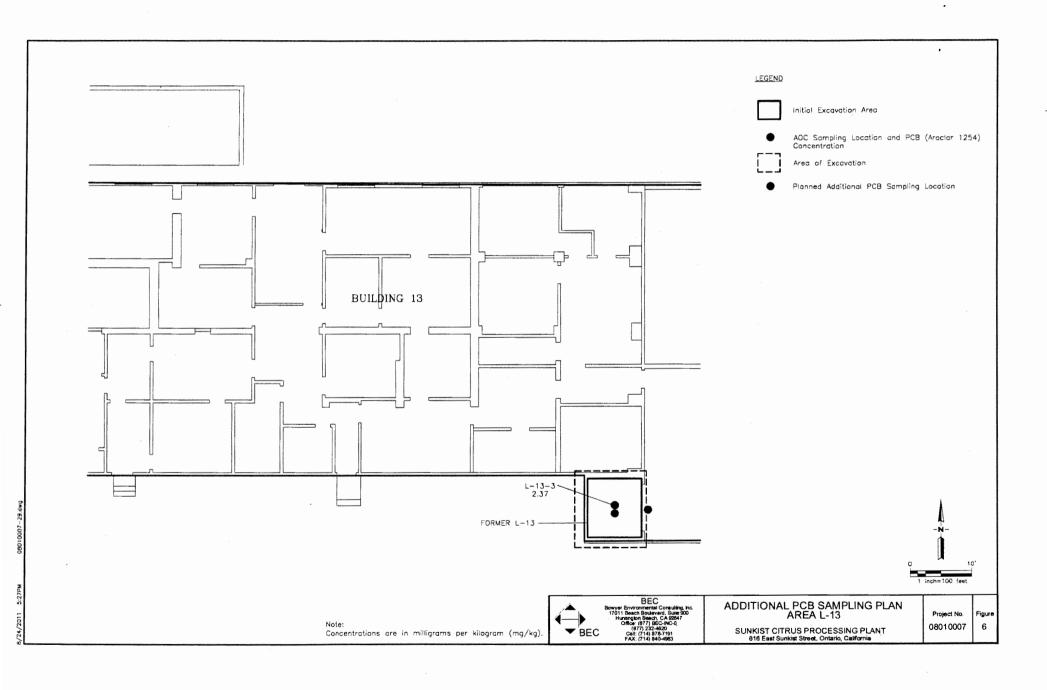
Aug 30, 2011

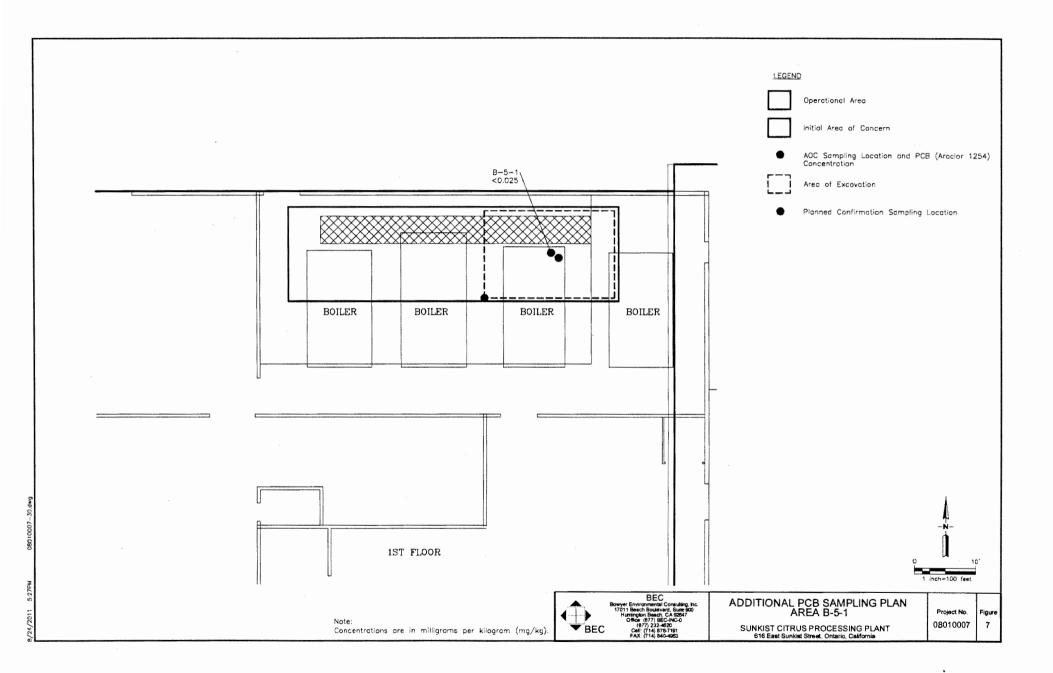
Former Sunkist Citrus Processing Plant

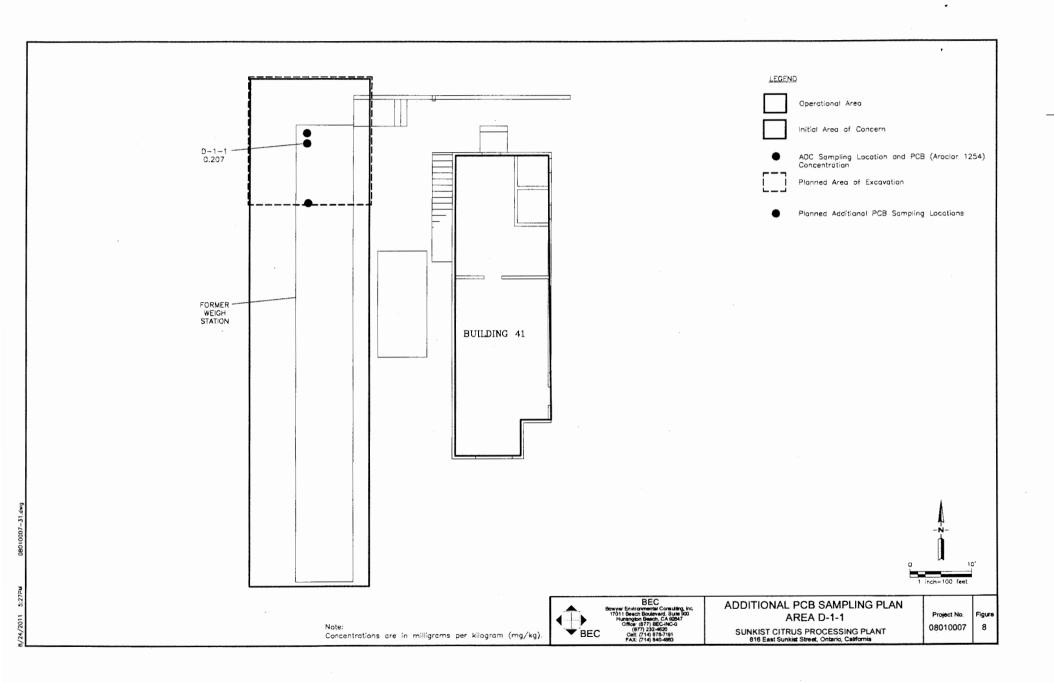
Ontario, California

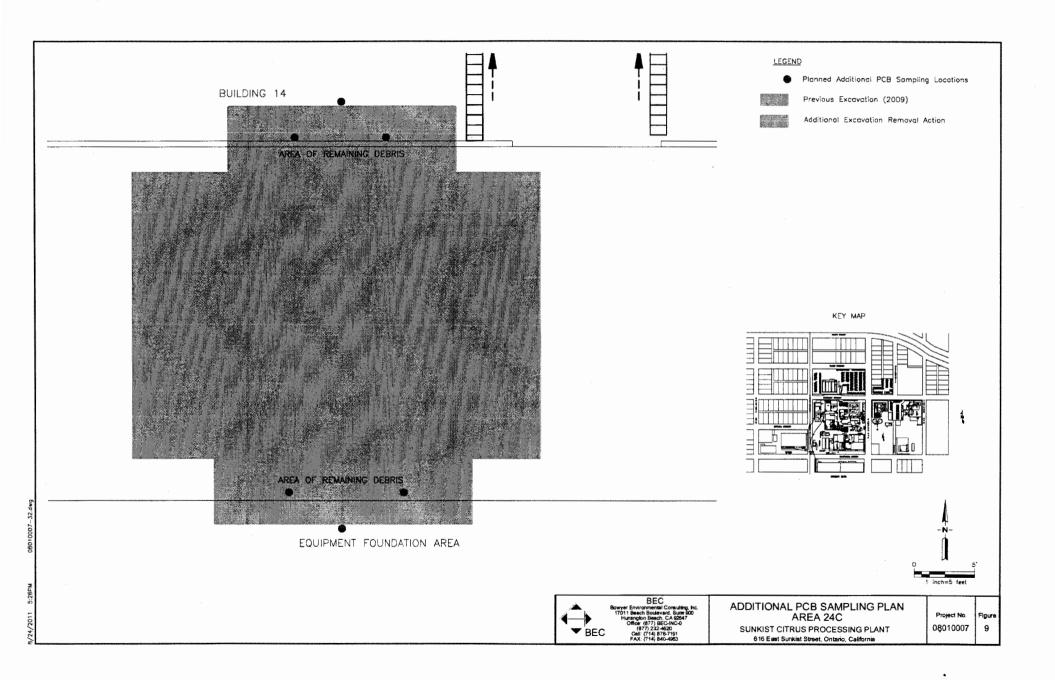
Project No. 08010007 Figure No.











Attachment A

Statistical (ProUCL) Evaluation of Crushed Concrete

Statistical Evaluation

	Basement 11	Basement 64	Western - South	Eastern D	Eastern B	Eastern A	Eastern C	Eastern Pile 11	Eastern Pile 12	Eastern Pile 13	Eastern Pile 18	Eastern Pile 19	Eastern Pile 20	Eastern Pile 21
	Total PCBs	Total PCBs	Total PCBs	Total PCBs	Total PCBs	Total PCBs	Total PCBs	Total PCBs	Total PCBs	Total PCBs	Total PCBs	Total PCBs	Total PCBs	Total PCBs
	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)	(mg/kg)
	2	0.122	0.279	8.050	1.980	0.738	2.980	0.258	0.447	5.330	5,030	0.332	0.444	0.274
	1.33	2.59	0.321	5.990	1.890	1.720	3.200	0.770	0.261	1.860	0.439	0.775	0.154	1.140
	0.992	0.822	0.642	6.420	1.560	1.080	3.130	0.209	0.272	3.930	1.110	0.156	0.158	0.710
	3.67	1.01	2.200	2.690	0.847	5.610	3.140	0.416	0.121	1.680	0.372	0.416	1.340	0.705
	2.51	0.42	1.900	2.090	1.440	1.360	1.670	0.227	0.296	0.820	0.310	1.520	0.695	0.510
	5.41	0.68	4.630	0.955	1.540	2.810	5.140	0.640	0.795	0.636	0.635	0.290	0.214	0.327
Data		0.879	1.090	2.600	2.400	1.840	1.910	0.0928	0.482	4.860	0.511		0.098	0.471
		1.04	1.440	2.510	2.330		1.850				0.324			
		0.175		9.280	1.240						0.313			
		ND<0.025									0,839			
		3.02									0.339			
		2.25									0.828			
		4.79									0.313			
Statistial Parameters														
Number of Samples (n)	6	13	8	9	9	7	8	7	7	7	- 13	6	7	7
Degrees of Freedom (df, n-1)	5	12	7	8	8	6	7	6	6	6	12	5	6	6
Student t value (t)	1.476	1.356	1.415	1.397	1.397	1.44	1.415	1.44	1.44	1.44	1.356	1.476	1.44	1.44
Sample Mean Concentration	2.65	1.37	1.56	4.51	1.69	2.17	2.88	0.37	0.38	2.73	0.87	0.58	0.44	0.59
Sample Standard Deviation (s)	1.65	1.40	1.42	2.97	0.51	1.66	1.12	0.25	0.22	1.94	1.27	0.50	0.45	0.29
Variance (s^2)	2.72	1.97	2.03	8.82	0.26	2.74	1.26	0.06	0.05	3.77	1.62	0.25	0.20	0.09
Delta	1.85	3.13	2.94	-0.01	2.81	2.33	1.62	4.13	4.12	1.77	3.63	3.92	4.06	3.91
Appropriate Number of Samples to Collect from Waste	1.73	0.37	0.47	193027.36	0.06	1.04	0.96	0.01	0.01	2,50	0.23	0.04	0.03	0.01
Additional Samples to Collect	None	None	None	193018	None	None	None	None	None	None	None	None	None	None
95% Upper Confidence Limit	4.01	3.07	2.52	6.35	2.01	3.84	3.63	0.56	0.54	4.16	2.42	1.00	0.99	0.81
Stockpile Needs to Be 5ampled and/or Removed?	No	No	No	Yes	No	No	No	No	No	No	No	No	No	No

Regulatory Threshold (mg/kg)

4.3

Attachment B

Dust Management Plan

Ambient air will be monitored for the presence of dust throughout active demolition and/or grading operations. Activities monitored will include, but not be limited to crushing of concrete, demolition of above and/or below ground structures, movement of materials, and grading.

The dust measurements will be collected during these activities using a Thermo MIE pDR-1000 DataRam. Measurements will be collected downwind, upwind and within working zones. At a minimum, one measurement will be collected every 15 minutes during ongoing operations. Additional dust measurements will also be obtained along the western fence line to evaluate the potential for dust to migrate off-Site to the nearby residential properties.

The following sections describe the method utilized to derive action levels associated with the dust monitoring program and mitigation measures that will be taken to limit the amount of dust generated.

Dust Action Level Calculation for the Protection of Onsite Workers

Aroclor 1254 been detected in crushed concrete and soil at the Site. The NIOSH Recommended Exposure Limit (REL) for Aroclor 1254 is 0.001 milligrams per cubic meter (mg/m³). The REL is a time-weighted average (TWA) concentrations for up to a 10-hour workday during a 40-hour workweek, above which inhalation is considered by NIOSH to be a concern. Data collected from soil and crushed concrete samples has detected Aroclor 1254 at up to 27 mg/kg. By conservatively assuming that all dust generated at the Site has an Aroclor 1254 concentration of 27 milligrams per kilogram (mg/kg), the amount of dust in air required to hold no more than 0.001 mg of Aroclor 1254 has been calculated (37.0 milligrams). As such, the conservative dust action level for the protection of onsite workers has been calculated at 37.0 mg/m³. As this number is likely to allow for the presence of significant visible dust, an even more conservative action level of 12 mg/m³ has been established for all work zones at the Site.

Dust Action Level Calculation for the Protection of Offsite Residents

A conservative evaluation of the action level for off-Site dust to residences

was calculated based on the most elevated concentration of PCBs in crushed concrete, and the concentration in air that is protective of residential receptors per the EPA Regional Screening Levels (RSLs) table. According to the RSL table, an Aroclor 1254 concentration in air equal to 4.3E-03 ug/m³ is protective of residential receptors. Data collected from crushed concrete samples has detected Aroclor 1254 at up to 27 mg/kg (please note that the limited area of uncrushed concrete on the WWTP that contained up to 66.6 mg/kg of Aroclor 1260 will not be crushed and it is not likely that a significant amount of dust will be generated during the removal of this material). Assuming all dust generated at the Site had an Aroclor 1254 concentration of 27 mg/kg, the amount of dust in air required to hold no more than 4.3E-03 micrograms of Aroclor 1254 is 0.159 milligrams. Thus, the conservative dust action level for the protection of off-Site residential receptors is 0.159 mg/m³.

Mitigation Measures

At any time during these monitoring activities bulk dust concentrations in excess of 12 mg/m³ are measured, work will be halted and additional dust suppression activities will be implemented until the conditions are abated. In addition, if at any time bulk dust concentrations in excess 0.159 mg/m³ are observed along the western fence line due to on-Site activities, work will be halted and additional dust suppression activities will be implemented. These additional dust suppression activities will involve the application of additional water or dust suppression agent such as SoilTac tm or Gorilla Snottm, if necessary.

Attachment C

PCB Activity Notification and Proof of Delivery

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Name of Facility Former Ontario Citrus Processing Plant	Name of Owner Facility Sunkist Growers, Inc.	2. EPA Identification Number (If already assigned under RCRA) CAD981412828					
3. Facility Mailing Address (Street or PO B 616 East Sunkist S Ontario, Californi	treet	4. Location of Facility (No. Street, City, State, & Zip Code) 616 East Sunkist Street Ontario, California 91761					
5. Installation Contact (Name and Title) Keith Rudd Director of Environ Telephone Number (Area Code and Number 559-684-3673		6. Type of PCB Activity (Mark 'X' in appropriate box. See Instructions. A. Generator w/onsite storage facility B. Storer (Commercial) C. Transporter D. R&D/Treatability E. Approved Disposer F. Scrap Metal Recovery Oven/Smelter, High Efficiency Boilers					
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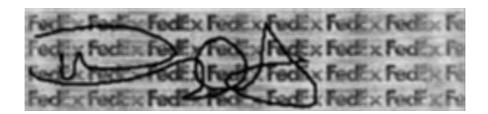
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Bowyer Environmental Consulting



September 2, 2011

VIA ELECTRONIC AND U.S. MAIL

Ms. Carmen Santos Waste Management Division U.S. Environmental Protection Agency Region 9 75 Hawthorne Street San Francisco, CA 94105

Subject:

Porous Media Sampling and Removal Action Plan

Wastewater Treatment Plant

Former Sunkist Citrus Processing Plant

616 E. Sunkist Street Ontario, California

Dear Ms. Santos:

Bowyer Environmental Consulting, Inc. (BEC) has prepared this data summary and removal action plan (Report) in association with porous media at the Wastewater Treatment Plant (WWTP), which is part of the Sunkist Growers, Inc. (Sunkist) former Citrus Processing Plant (Site). The Site is located at 616 E. Sunkist Street in the Ontario, California. The Site location is shown on Figure 1. The facilities prior to demolition activities are depicted on Figure 2.

The work summarized in this Report, which consisted of the collection/analysis of a series of porous media samples for the presence of polychlorinated biphenyls (PCBs), was conducted per the approved email work scope that was submitted to the United States Environmental Protection Agency (EPA) on June 22, 2011. The EPA approved the work scope via email correspondence that was received on June 22, 2011. The removal action activities presented in this Report are consistent with the application for the cleanup of PCB remediation waste (BEC, May 22, 2011), which was conditionally approved by the EPA on August 19, 2011.

The primary objective of the sampling program presented in this Report was to characterize porous materials prior to demolition. The goal of the removal action activities provided in this Report are to separate and properly dispose of (off Site) of porous media that is in excess of the approved risk-based cleanup goals prior to demolition of the WWTP foundations.

BACKGROUND

The WWTP was modified during a major capital expenditure program conducted approximately 10 years ago by Sunkist. During this program, entirely new above ground features were installed to facilitate a larger and more efficient WWTP (Modified WWTP) as, at the time, there was no plan to demolish the facility. The Modified WWTP encompassed an area of approximately 36,000 square feet. Figure 3 shows the primary features associated with the Modified WWTP.

It is probable that certain previously existing foundations associated with the historical facilities were utilized to support the new above-grade structures associated with the Modified WWTP. In October 2010, during a sampling program associated with the pre-demolition characterization of porous media sampling at Buildings 12 and 15, a single porous media sample (WW-A) was collected from an expansion joint associated with the primary foundation at the WWTP. This sample (designated "A", at the location shown on Figure 3) was found to contain 19.89 milligrams per kilogram (mg/kg) of PCBs (Aroclor 1260). This result supported the conclusion that the foundations associated with the current WWTP predated the modifications made approximately 10 years ago, as PCBs were not being used in construction materials during this time period (2000 to 2002). Based on these results, the EPA requested the implementation of a porous media sampling effort of the foundations at the WWTP prior to demolition.

SCOPE OF SAMPLING PROGRAM

The porous media sampling program at the WWTP was conducted on June 23, 2011. A total of 64 porous media samples were collected during this effort. Sample collection locations are shown on Figure 3.

All sampling was done in accordance with the Standard Operating Procedures Sampling for Sampling Porous Surfaces for Polychlorinated Biphenyls (SOP - USEPA Region I, October 21, 2008). The SOP recommends sampling where:

- Stained areas are present (at least 3 samples of each porous material present in each area); and
- PCBs equipment was used or where PCBs were stored (sampled at a frequency of 1 sample every 100 square feet).

Given these requirements, a pre-sampling inspection was done at the WWTP to document the presence of surface staining. Based on this inspection, two stained areas were identified. These areas and the sampling program implemented are described as follows:

- **WW-AOC-1** A 40 by 10 foot (400 square foot) area of moderately darkstained concrete within an above-ground storage tank berm – Four samples (WW-AOC-1-A through WW-AOC-1-D) were collected from this area.
- WW-AOC-2 A 10 by 10 foot (50 square foot) area of moderately darkstained concrete near the former sump pump location - Three samples (WW-AOC-2-A through WW-AOC-2-C) were collected from this area.

In addition to these two discrete areas of discolored concrete, a black colored linear expansion joint in the primary concrete foundation of the WWTP was found to be present over a total length of approximately 700 feet. This feature, which consists of dark-colored, fibrous grout material, was sampled previously (sample WW-A) and found to contain relatively high concentrations of PCBs. As such, one sample of this material was collected at approximately every 35 linear feet along this expansion joint feature. A total of 20 samples (WW-B through WW-U) of this material were collected and analyzed as part of this effort.

Additional sampling was done throughout the remainder of the WWTP on a grid-based pattern. During this grid-based sampling effort a total of 16 samples were collected from concrete and 21 samples were collected from asphalt (37 total samples).

Each of the 64 samples was collected by applying an impact hammer equipped with a 1-inch carbide drill at the designated sampling points. This process created a finely ground powder from the porous material. Approximately 2 ounces of this material was collected from each sampling location. The ground sampling

material was placed into a pre-cleaned, laboratory provided 4-ounce glass container with a Teflon-lined lid.

The samples were sealed, labeled and placed in a refrigerated container for transport to ABC Environmental Laboratories (ABC) in Ontario, California for analysis. A chain-of-custody form was completed upon sample collection and accompanied the samples to ABC. ABC analyzed each of the samples for PCBs by EPA Method 8082. Extractions for the samples were performed via EPA Method 3550C. The analytical laboratory reports produced by ABC are provided in Appendix A.

PROGRAM RESULTS

The results from the recent and previous sampling efforts at the WWTP (including WW-A) are summarized on Table 1. As shown two aroclors (Aroclor 1254 and Aroclor 1260) were observed during this testing program. Aroclor 1254 was detected in 30 of the 65 samples (46%) at relatively low concentrations. The lowest detected concentration of Aroclor 1254 was 0.0384 milligrams per kilogram (mg/kg) and the highest detected concentration was 4.44 mg/kg. Aroclor 1260 was only detected in 9 of the 65 samples (14%) but was observed at higher concentrations. The lowest detected concentration of Aroclor 1260 was 0.191 milligrams per kilogram (mg/kg) and the highest detected concentration was 66.6 mg/kg. The detected concentrations of Aroclor 1254 and Aroclor 1260 are posted on Figures 4 and 5, respectively.

Based on the results, only four samples were found to be in excess of the approved risk-based cleanup criteria (USEPA, August 19, 2011). These samples (WW-A, WW-F, WW-R, and WW-T) all originated from the dark-colored, fibrous grout material. One of these samples (WW-F) had a concentration (66.6 mg/kg) in excess of the TSCA waste disposal criteria. All of these four samples were clustered in the western portion of the main concrete slab associated with the WWTP, as shown on Figure 5.

PROPOSED ADDITONAL SAMPLING AND REMEDIAL ACTION

Based on the results of the porous material sampling program, the impacted section of concrete has been defined in the western portion of the WWTP. In order to provide additional verification regarding the extent of impacts to the east and

south of the impacted area a series of additional porous media samples will be collected as shown on Figure 6.

Following the completion of this additional sampling effort, the impacted area of concrete will be separated during the demolition of the WWTP. Based on the current data set, the area to be separated and disposed of off-Site is shown on Figure 6. The exact extent of the area to be separated and disposed of off-Site will be modified as necessary based on the results from the additional porous media sampling effort.

The separated concrete will be excavated and stockpiled for off-Site disposal. The impacted concrete will be lifted and broken into manageable size pieces with the use of an excavator. The pieces of concrete will generally be between 1.0 and 5.0 feet in maximum diameter. As shown on Figure 6, the smaller area encompassing WW-F will be separated and managed as a TSCA waste. The larger section of less highly impacted concrete will be placed into a single stockpile and managed as PCB-containing material. Both stockpiles will be disposed of off-Site at appropriately permitted facilities. At this time it is anticipated that the TSCA waste will be disposed of at the US Ecology landfill in Beatty, Nevada, and that the PCB containing material will be disposed of at Waste Management El Sobrante landfill in Corona, California.

Following the removal of concrete, a soil sampling program will be implemented. A series of soil samples will be collected from depths of 0 to 3 inches beneath the former location of impacted concrete. The planned soil sampling locations are shown Figure 7.

All sampling and analysis performed as part of this program will be done in conformance to the Sampling and Analysis Plan and Quality Assurance Project Plan which were prepared as part of the risk-based PCB cleanup application package (BEC, May 22, 2011). During the removal effort and subsequent additional demolition, wind erodible surfaces, surface soil (where support equipment and vehicles operate) and loose soil/demolition debris will be stabilized by applying water in sufficient quantities to prevent the generation of visible dust plumes. Water will be pre-applied prior to moving any soil and/or demolition debris, and reapplied as often as necessary to maintain damp conditions so that visible emissions do not exceed 100 feet in any direction.

Dust measurements will be collected during these activities using a Thermo MIE pDR-1000 DataRam. Measurements will be collected downwind, upwind and

within working zones. At a minimum, one measurement will be collected every 15 minutes during ongoing operations. At any time during these monitoring activities visible dust is observed, or bulk concentrations in excess of 12 micrograms per cubic meter (ug/m³) are measured, work will be halted and additional dust suppression activities will be implemented until the conditions are abated. Additional dust measurements will be obtained along the western fence line to evaluate the potential for dust to migrate off-Site to the nearby residential properties. A conservative evaluation of the action level for off-Site dust to residences was calculated based on the most elevated concentration of PCBs in crushed concrete and the concentration in air that is protective of residential receptors per the EPA Regional Screening Levels (RSLs) table. According to the RSL table, an Aroclor 1254 concentration in air equal to 4.3E-03 ug/m³ is protective of residential receptors. Data collected from crushed concrete samples has detected Aroclor 1254 at up to 27 mg/kg (please note that the limited area of uncrushed concrete on the WWTP that contained up to 66.6 mg/kg of Aroclor 1260 will not be crushed and it is not likely that a significant amount of dust will be generated during the removal of this material). Assuming all dust generated at the Site had an Aroclor 1254 concentration of 27 mg/kg, the amount of dust in air required to hold no more than 4.3E-03 micrograms of Aroclor 1254 is 0.159 milligrams. Thus, the conservative dust action level for the protection of off-Site residential receptors is 0.159 mg/m³. If at any time the action levels in the work zones (12 mg/ m^3) or along the western fence line (0.159 mg/ m^3) are found to be exceeded due to on-Site activities, additional dust suppression activities will be implemented. These additional dust suppression activities will involve the application of additional water or dust suppression agent such as SoilTac tm or Gorilla Snottm, if necessary.

This work is scheduled to resume on September 6, 2011. It will take approximately two weeks to complete. A summary of this effort will be provided in the completion report associated with the PCB remediation waste cleanup application.

CLOSING

This data summary and removal action plan was prepared in association with porous media sampling and planned removal actions associated with the former WWTP, of the former Citrus Processing Plant Ontario, California. The sampling program was conducted per an approved work scope, and the removal program will be done in compliance with the approved PCB remediation waste cleanup

application. If you have any questions regarding this document, please feel free to call.

Sincerely,

Brett H. Bowyer, P.G.

Principal

Bowyer Environmental Consulting, Inc.

Figures